

MEMORANDUM

SUBJECT: Traditional Neighborhood (T) District Zoning Study
TO: Planning Commission
FROM: Comprehensive and Neighborhood Planning Committee
DATE: September 5, 2025

SUMMARY

This zoning study provides background information and analysis on the Traditional Neighborhood (T) District standards and proposes amendments to them. One set of amendments focuses on the T Districts’ intent statements, dimensional standards (including density bonus provisions for projects that provide affordable housing units) and design standards. A second set of amendments focuses on other chapters of the Zoning Code that relate to the T Districts.

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PURPOSE OF THE STUDY

The T District Zoning Study was initiated in March 2022 to better align the four T Districts (T1-T4) with Comprehensive Plan goals and policies related to transit-supportive density, flexible building design, high-quality urban design, pedestrian-friendly streetscapes, and affordable housing. Given the city's 20 years of experience with the T Districts, this study is an opportunity to update the existing regulations to more effectively meet the goal of facilitating well-designed, mixed-use development wherever these districts are used in the city, especially along transit corridors.

The 2040 Comprehensive Plan supports new affordable housing and compact, pedestrian-friendly, mixed-use development with flexibility to respond to changing conditions and opportunities (See Attachment 3 for relevant policies). The 2040 Comprehensive Plan's implementation chapter calls for systematically updating the Zoning Code. [Minnesota Statutes Section 473.858](#) requires the zoning code to be brought into conformance with the comprehensive plan by the local governmental unit. The intent of the zoning study is to modernize and streamline T District regulations based on what has been learned about their effectiveness since adoption in 2004, including a focus on affordable housing. To that end, the study recommends zoning text amendments related to T Districts and other relevant sections of the Zoning Code.

GENERAL BACKGROUND

The [T Districts](#) were adopted in 2004 to provide for compact, higher density, pedestrian- and transit-oriented mixed-use development, and to foster high-quality urban design. In 2011, the City updated the T Districts in relation to the Central/Green Line Light Rail Corridor. The amendments included the addition of the T4 District accompanied by rezoning of Central Corridor properties to T2, T3, and T4. The T Districts are now widely used throughout Saint Paul, especially along transit corridors and at major nodes. T Districts are often used as the base zoning in new master plan areas. Table 1 below provides a high-level summary of the existing T Districts.

Table 1: T District Summary

Zone	T1	T2	T3	T4
Intent	Compact, pedestrian-oriented mixed-use areas of limited size; transition of land along major thoroughfares, between commercial or industrial districts and less intensive land uses	Compact, pedestrian-oriented commercial and residential development that supports transit usage with a variety of housing types; transitions to residential neighborhoods	Higher-density pedestrian- and transit-oriented mixed-use development with a variety of housing types and interconnected streets and open spaces	High-density, transit-supportive, pedestrian-friendly mixed-use development, particularly near transit stops along fixed rail transit
Building Types Allowed	1-family, 2-family, multifamily, nonresidential or mixed-use	1-family, 2-family, multifamily, nonresidential or mixed-use	1-family, 2-family, multifamily, nonresidential or mixed-use	Multifamily, nonresidential or mixed-use
Height (max.)	35 ft., with additional height allowed with additional stepback	35 ft. (45 ft. with CUP), with additional height allowed with additional stepback	45 ft. multifamily; 55 ft. mixed-use (90 ft. with CUP and additional stepback)	75 ft. (additional height may be approved with CUP and additional stepback)

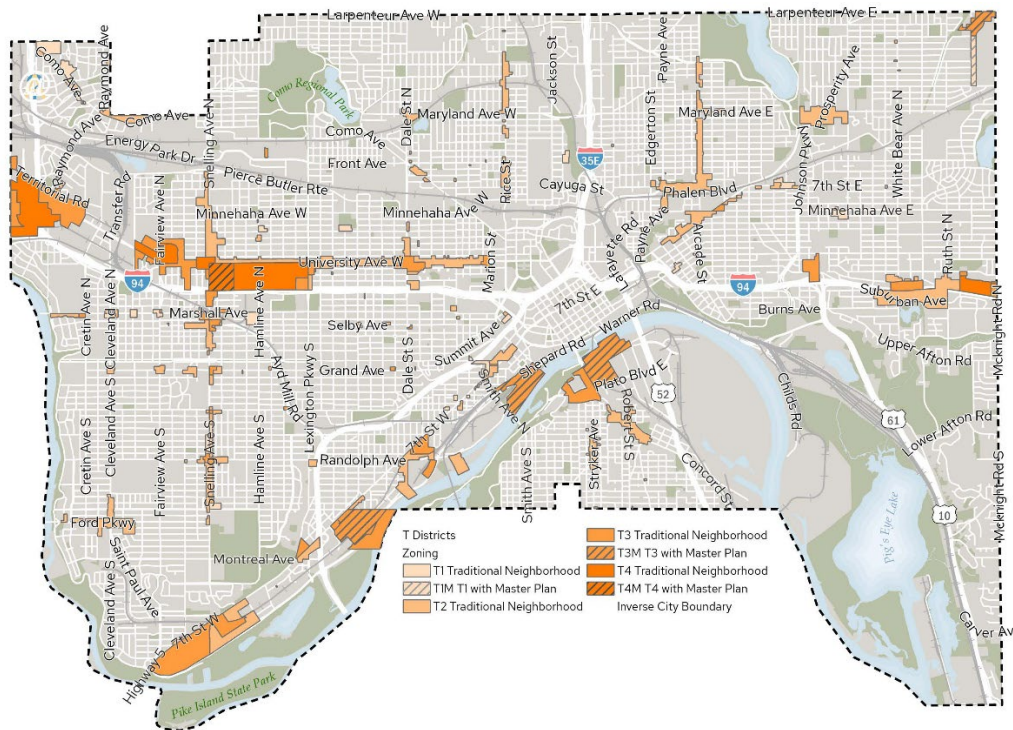
Since their adoption, planning staff have frequently utilized T Districts when rezoning properties. As of 2019, 5.7 percent of Saint Paul acreage was zoned T, representing a 53.2 percent increase in acreage zoned T1, a 10.9 percent increase in acreage zoned T2, and an 8.9 percent increase in acreage zoned T3 over a two-year span. Figure 1 on the following page illustrates the distribution of T Districts throughout the city. The T Districts are indicated in orange with darker orange representing higher intensity T Districts.

EXECUTIVE SUMMARY

The zoning study seeks to modernize standards and streamline code language. The proposed amendments to the Zoning Code were suggested by city staff in the Departments of Planning and Economic Development (PED) and Safety and Inspections (DSI) as well as from input resulting from community outreach when the zoning study was initiated. Key highlights of the amendments are described below.

- **Clarified Purpose of T Districts (Section 66.310).** The zoning study recommends updates to the general and specific intent statements to be consistent with the Comprehensive Plan and reflect how the districts have been implemented and developed since their adoption in 2004.
- **Increased Development Flexibility at Nodes and Corridors (Section 66.331).** To promote development flexibility at neighborhood nodes and along transit corridors, numerous amendments are proposed to update the T District density and dimensional standards. Amendments relate to density/floor area ratio (FAR), lot size, building height, setbacks, and building placement, including increasing height maximums in T2 and T3 and changing front yard setback maximums and density minimums.
- **Additional Neighborhood-Scaled Uses Allowed (Section 66.321).** Additional flexibility for neighborhood-scaled land uses, such as cluster developments and general retail, is proposed to promote opportunities for diverse mixed uses.
- **Incentives for Affordable Housing (Section 66.331).** The footnotes of the Density and Dimensional Standards Table are proposed to include a density bonus for affordable housing.
- **Streamlined Objective Design Standards (Section 66.343).** Numerous amendments are proposed to modernize and streamline the T District design standards, making them easier to understand and administer.
- **Improved Code Language.** Overall, code language is proposed to be updated with the term “must” rather than “shall” as this is the industry standard. In other cases, “should” or “may” are also replaced by “must” for clarity of implementation.

Figure 1: Map of Traditional Neighborhood Districts



COMMUNITY OUTREACH AND ENGAGEMENT

In spring 2022 at the beginning of the zoning study, staff reached out to district councils, community organizations, developers, and the Business Review Council to seek ideas and input on the zoning study. The amendments proposed in the study are informed by the input received during initial community outreach, a summary of which can be found in Attachment 4. In spring 2025, staff conducted two informational sessions with district council members and business association representatives and presented at two Business Review Council meetings. The revised proposed amendments are also informed by these follow-up community engagement events.

PLANNING COMMISSION PUBLIC HEARING

Public Hearing

On Friday, July 11, 2025, the Saint Paul Planning Commission held a public hearing on the T District Zoning Study. Notice of the public hearing was published in the Saint Paul Pioneer Press on July 1, 2025 and sent to the Early Notification System list on May 21, 2025. Five community members provided verbal testimony at the public hearing and 46 community members or organizations submitted written testimony during the public comment period open from May 16 through July 14, 2025. Of the written testimony, one was received from the Union Park District Council, one from the Saint Anthony Park Community Council, one from the Business Review Council, and one from Sustain Saint Paul. The other comments were provided by community members.

Analysis of Testimony

All but one testimonial supported the amendments. Many offered suggestions for recommended edits. Key themes and responses are summarized below.

1. Zoning Study Support

Summary. Most of the testimony was in support of the Zoning Study. Many comments expressed a desire for development and land use flexibility at nodes and along corridors. Testifiers were generally interested in increasing walkability and making it easier to walk to a mix of land uses within and adjacent to urban neighborhoods. Many comments also expressed support for density bonuses for affordable housing.

Response. The proposed amendments aim to increase flexibility for pedestrian-oriented mixed-use development at nodes and along corridors. The proposed amendments also create a density bonus for additional FAR if providing affordable housing at 60 percent AMI. No changes to the public hearing draft are proposed.

2. Expand Geography of T Districts

Summary. Many comments expressed a desire for the City to proactively rezone properties along corridors to T Districts. Commenters stated that rezoning properties to T Districts would provide more pedestrian-oriented development and land use flexibility in areas of Saint Paul that are supported by transit and allow the City the potential to build its tax base and create community-driven economic development opportunities. Some commenters were also

interested in rezoning areas zoned for Business (B) Districts into T Districts, and rezoning parcels that formerly included commercial structures and are now zoned residential into T Districts.

Response. The approved scope of work for this Zoning Study does not include zoning map changes. Staff will prepare a follow-up study which will include recommendations for proactively rezoning properties to T Districts along key corridors. This will be initiated once City Council takes action on the T District Study to ensure the scope of the follow-up rezoning study is based on any final changes or modifications. Other rezoning objectives, like phasing out B Districts, may be considered as part of a future effort.

3. Consolidate T1 into T2

Summary. Many comments expressed interest in consolidating T1 into T2 to allow parcels currently zoned T1 to become T2. Commenters stated that this would benefit parcels zoned T1 by giving them more permitted land uses, despite having similar dimensional standards.

Response. T1 is a low-intensity, neighborhood-scale mixed-use zoning district that can provide new utility at smaller scales as drafted, particularly at corners of urban neighborhoods. Since its development, T1 has had marginal utility due to its very limited commercial uses. Through the proposed amendments, T1 and T2 will have more meaningful differences, enabling them both to be more useful and better aligned with their intents. The added land use allowances in T1 (e.g., general retail, coffee shop, animal day care, etc.) will allow more neighborhood-serving uses within walking distance of neighborhoods, and the amended maximum height in T2 (45 feet) helps separate dimensional standards between the districts. This is particularly useful for allowing businesses like corner stores, coffee shops, delis, etc. at the smallest neighborhood scale. This is not a zoning tool that has previously existed and could have an impact at improving walkability in lower density neighborhoods away from commercial and mixed-use corridors. Consolidating T1 with T2 and removing T1 from the Zoning Code would eliminate a context-sensitive mixed-use district that could be a useful asset to the city, so staff recommends maintaining the separation between T1 and T2.

4. Allow Small Restaurants and Bars in T1

Summary. Some comments expressed a desire for more land use flexibility in T1, particularly allowing restaurants and bars as a permitted land use to create more business opportunities within urban neighborhoods.

Response. As proposed in the public hearing draft, T1 is a low-intensity, neighborhood-scale mixed-use zoning district that can provide benefits in smaller-scaled neighborhoods. Land uses added by the proposed amendments will enable more neighborhood-serving uses within walking distance of neighborhoods and create new business opportunities like corner stores, delis, coffee shops, etc., while still balancing the small-scale context envisioned by T1. By supporting smaller neighborhood-scaled businesses, T1 can have a wider application throughout the city in the future. During the drafting process of the T District Zoning Study, restaurants and bars were considered and rejected because of the noise and hours of operation associated with these uses. These uses were more appropriate along corridors, which are typically zoned T2-T4 and not at the smaller-scale of T1 where it is typically adjacent to

residential districts. Allowing restaurants and bars in T1 would reduce its viability as a low-intensity option for mixed-use development in smaller-scaled neighborhoods. No changes are proposed to the public hearing draft.

5. *Opposition to Applying Building Façade Continuity Design Standard in T1*

Summary. Some comments expressed concerns with the building façade continuity design standard applying to certain land uses in T1. Commenters felt it was not appropriate to require façade continuity for civic and institutional uses intended on large lots with large open spaces.

Response. The T District design standards are intended to ensure well-designed buildings with visual interest are built in areas zoned T. The proposed amendments include removing the T District design standards applicability table and subjecting all amended design standards to all new development in all T Districts. The building façade continuity design standard requires new buildings to provide a continuous façade along commercial and mixed-use streets. T1 is sometimes used for civic and institutional lots, making this design standard inappropriate for these contexts. The public hearing draft has been revised to reflect an exemption of this design standard for civic and institutional uses.

6. *Improve Organization of Intent Statements*

Summary. One set of comments recommended improvements to the organization of the T District intent statements so they have a more consistent flow.

Response. Revisions to the intent statements of the public hearing draft are proposed in Secs. 66.312 – 66.314 to better differentiate and describe the differences among the T Districts.

7. *Opposition to New Storage Facilities in T Districts*

Summary. Some comments were concerned with storage facilities being allowed in T Districts because the land use would not contribute to the vibrancy of nodes and transit corridors.

Response. Storage facility, mixed-use is proposed as a permitted land use in T3 and T4 as long as it does not exceed 15 percent of the floor area of a building, have storage units on the first floor or at skyway level, or have a primary entrance within the front third of the building. These standards help ensure that if a storage facility is included as part of a mixed-use project, it would be limited in size and would not negatively affect the pedestrian experience of the building. While storage facilities are not an active land use, a small-scale facility as part of a mixed-use project can provide important storage opportunities in urban contexts. Staff recommends maintaining the use as proposed.

8. *Further Simplify and Streamline Dimensional Standards and Footnotes*

Summary. One set of comments provided ideas for further simplifying the dimensional standards table and considerations for consolidating footnotes. The commenter noted that some dimensional standards can be altered based on footnotes and preferred a more straightforward approach to regulation. Comments also suggested replacing FAR standards with a requirement for shadow studies for projects over four stories or 50 feet, which are currently only required as part of a conditional use permit application. Comments stated that FAR was

difficult to understand and could lead to unpredictable built results. One commenter suggested a change to the way lot size is calculated.

Response. The proposed amendments simplify the dimensional standards by consolidating building types, FAR, heights, setbacks, etc. These improvements will make the dimensional standards table more straightforward and clear, as illustrated in the proposed clean amended table [online](#). Other zoning district sections of the Saint Paul Zoning Code follow a similar organization, with dimensional standards tables followed by footnotes for alterations or exceptions to certain standards. While there are still opportunities to improve and simplify the T District table and footnotes to a greater extent, any additional change could be inconsistent with the organization of other zoning district sections. Staff recommends exploring opportunities for more streamlining that could benefit the Zoning Code overall in a separate future effort. Additionally, while FAR often needs a brief introduction, it serves an important purpose by standardizing the intensity and mass of buildings in mixed-use environments. Because the T Districts include minimum and maximum setback standards, the required FAR of a building will predictably be provided close to the street. Shadow studies are required on an as needed basis by the Planning Commission for projects applying for a conditional use permit for additional height. Requiring shadow studies for all new development over four stories or 50 feet would not provide a more streamlined, efficient process and would be unnecessary for many projects because of lot area, street buffers, or topography. Projects needing a CUP for height are precisely those that may have an impact to neighboring properties because of the additional height. Staff recommends maintaining FAR as the intensity standard in T Districts and continuing to only require shadow studies if needed as part of a CUP application. Lot size is calculated consistently throughout the city, so no changes are recommended to the public hearing draft to maintain consistency with other zoning districts.

9. Remove Maximum Front Setback Standards

Summary. One comment requested the removal of maximum front setback standards as they were perceived to be overly complex and unnecessary when the T Districts have requirements for parking to be placed to the side or behind buildings.

Response. Minimum and maximum setbacks create a setback range in which the building can be placed, which leads to predictable built results. Maximum front setback requirements are an important tool to ensure new development in walkable environments is built with a relationship to the street with easy access for pedestrians. The proposed setback ranges are somewhat flexible, striking the right balance between predictable built results and development flexibility given site-specific considerations. No changes to the public hearing draft are proposed.

10. Consider Stricter AMI Requirement for Density Bonus

Summary. One comment suggested lowering the AMI threshold because area median income is based on regional rental prices, which skew affordable rents to be less impactful in Saint Paul because the city generally has a lower average rent than other regional communities.

Response. In 2020, Saint Paul adopted an affordable housing density bonus in multifamily residential (RM) districts that closely mirrors the bonus currently proposed for T Districts. Since

its adoption, this RM provision has resulted in the creation of 19 affordable housing units, all of which were produced without the use of public subsidy. As with the existing RM affordable housing density bonus, the proposed affordable housing density bonus in T Districts is intended to facilitate the development of unsubsidized affordable housing units in new developments that would otherwise be entirely market rate. While the bonus can also support subsidized affordable housing by allowing greater density, it has not been utilized in that manner over the past five years in RM districts.

Public testimony suggested lowering the AMI threshold required to qualify for the bonus; however, doing so would substantially limit the proposed bonus's utility. Producing new units affordable to households below 60 percent AMI typically requires deep public subsidies, which the density bonus alone cannot support. As a result, it is highly unlikely that new housing developments targeting lower AMI levels would be financially viable without public funding. Lowering the AMI threshold below 60 percent AMI would therefore risk reducing the overall number of affordable units produced with the proposed text amendment, as it would eliminate the incentive to provide affordable units for unsubsidized housing developments that will otherwise be entirely market rate. For this reason, staff recommends maintaining the 60 percent AMI threshold for the affordable housing density bonus, consistent with the standards already in place in RM and H districts.

11. Interest in the Student Housing Overlay District

Summary. Many comments suggested changes to the Student Housing Overlay District.

Response. The T District Zoning Study does not relate to the Student Housing Overlay District. Changes to the Student Housing Overlay District may be considered in a future effort. No changes to the public hearing draft are proposed.

AMENDMENTS TO T DISTRICT STANDARDS

This section describes proposed amendments to T District land use, dimensional, and design standards. Each amendment's proposed action is listed, followed by background information. See Attachment 1 for redlines of proposed amendments.

Intent of Traditional Neighborhood Districts: Sec. 66.310

Sec. 66.311. - General intent, T traditional neighborhood districts.

Proposed Action: Replace "urban village" with "neighborhood node" and "transit corridor." Add reference to "civic and institutional." Replace references to "density" with "intensity."

Background: The term "urban village" is no longer commonly used in the 2040 Comprehensive Plan, so references should be updated to "neighborhood node" and "transit corridor" to be consistent with the Comprehensive Plan. During initial zoning study outreach, a commenter noted that while the intent of T Districts references urban villages, which are localized and walkable, T Districts exist predominantly along corridors. "Civic and institutional" should be added to diversify the compatible mix of uses encouraged by the T Districts. "Intensity" is a more effective descriptor for the intent of

the T Districts than "density" because the term "density" can imply residential use, and the T Districts provide for a mix of uses.

Sec. 66.312. - Intent, T1 traditional neighborhood district.

Proposed Action: Reference the appropriateness of T1 zoning for traditional corner commercial buildings and civic and institutional uses. Add a descriptor to indicate T1 is a low-intensity traditional neighborhood district.

Background: T1 is not widely used throughout the city, and it tends to be isolated to individual lots or small groupings of lots. It is sometimes used for institutional lots (e.g., Luther Seminary, Concordia University), grade schools, churches, and libraries, as well as single family houses and service business uses.

Sec. 66.313. - Intent, T2 traditional neighborhood district.

Proposed Action: Add flexibility and a descriptor to indicate T2 is a medium-intensity traditional neighborhood district.

Background: T2 is widely used throughout the city, primarily along transit corridors, major thoroughfares, and neighborhood nodes, though there are some isolated parcels zoned T2. A majority of the isolated T2 districts are at corner locations and used for multifamily, institutional, or commercial buildings. Some flexibility in the T District intent statement is important to allow for the occasional use of T2 in areas beyond corridors or nodes. While the uses allowed in T2 and T3 districts are largely the same, the T2 district is distinguished from the T3 district by the height and intensity of allowed development.

Sec. 66.314. - Intent, T3 traditional neighborhood district.

Proposed Action: Add a descriptor to indicate T3 is a medium-intensity traditional neighborhood district. Delete reference to Sec. 66.314(a) to (d).

Background: The elements in Sec. 66.314(a) to (d) (i.e., mix of land uses, mix of housing types, system of streets, and system of open space) are more appropriate for large, master planned sites, and not reflective of how T3 has been used in practice.

Sec. 66.315. - Intent, T4 traditional neighborhood district.

Proposed Action: Add a descriptor to indicate T4 is a high-intensity traditional neighborhood district. Support development near transit corridors, in general.

Background: T4 is intended to support a variety of high intensity development types near transit, regardless of whether the mode is fixed rail, bus rapid transit, or regular route bus service, so the intent statement should reference "transit corridors" generally, instead of listing specific modes.

Traditional Neighborhood District Use Table: Sec. 66.321

Sec. 66.321. - Traditional neighborhood district use table.

Proposed Action: Remove "one-family dwelling" and "two-family dwelling" from being permitted in T3. Allow "cluster development" as a permitted/conditional use in all T Districts. Allow "general retail," "tattoo shop," and "health/sports club" as permitted uses in T1. Allow "animal day care" as a permitted use in T1 and T2. Allow "farmers market" without a possible conditional use permit in T1-

T4 (see below for more information). Remove “mail order house.” Allow “storage facility, mixed use” as a permitted use in T3 and T4.

Background: The intent of the T3 District calls for medium-intensity, pedestrian- and transit-oriented commercial, residential, civic, and institutional development, which is more compatible with medium and large-scale housing types than small, one-family and two-family dwellings (see below for more information). Cluster developments were clarified as an allowed land use and housing type during the 1-4 Unit Housing Study and adopted in the Zoning Code in 2023. The T Districts should also allow cluster developments if they meet certain use-specific standards (e.g., lot size, common open space, pedestrian path, etc.). T1 is intended to provide low-intensity, neighborhood-scale commercial, retail, and service uses in proximity to other uses, so “general retail,” “tattoo shop” and “health/sports club” should be allowed. Animal day care activity takes place within buildings and is a reasonable neighborhood-serving use in T1 and T2. “Mail order house” is an obsolete land use. Rental storage facilities should be allowed in T3 and T4 if located within a mixed-use building to match the allowances in B4 and B5.

Traditional Neighborhood District Density and Dimensional Standards: Sec. 66.331

Sec. 66.331. – Density and dimensional standards table.

Proposed Action: In T1 and T2 districts, combine “multifamily” and “nonresidential or mixed-use” into a single category labeled “All other.” In T3 and T4, combine building types into a single category labeled “All.” In T3, eliminate “1-family dwelling” and “2-family dwelling.” In T1 and T2 replace the range of units per acre for 1-family and 2-family dwelling uses with a minimum and maximum FAR requirement of 0.3-1.0. Use FAR as the intensity standard for all other uses and require a minimum FAR of 0.5 for T2 districts in light rail station areas. Allow building heights of 45 feet by right in T2 and 55 feet by right in T3. Reduce front yard setback minimums for 1 and 2 family dwellings from 15 feet to 10 feet in T1 and T2, and establish a 10-foot maximum front yard setback for the “All other” and “All” categories in T2, T3, and T4.

Background:

Building Type Consolidation. Having different T3 development standards by building type has been problematic in practice, leading to debate about what makes a building mixed-use. That is, how much space or percentage of space must be devoted to a commercial use to qualify as mixed-use and what are considered commercial uses? Do uses accessory to multifamily residential uses like fitness areas, virtual workspace areas, or common gathering areas/club rooms for recreation qualify as commercial space? Multifamily developers may opt for a mixed-use building, which allows a taller building height in T3 (i.e., 55 feet versus 45 feet for multifamily) without fully considering a commercial component and its occupiable space. Rather than differentiating building height by use, it is more useful to separate building types from land use terms, as multifamily and mixed-use buildings can often have very similar forms. It is more important to determine the building envelope and form and support the use(s) within the building envelope, if permitted by the zoning district.

FAR Consolidation and Replacement. The existing standards for density/intensity have been challenging to administer as small-scale housing types are required to use a density per acre standard, while larger scale building types follow a FAR standard. FAR, combined with the maximum setback standard, has proven to be an effective development standard to regulate massing and bulk of new construction, while still assuring the majority of the building will be placed near the public right-of-way. Given the smaller lot size of typical T1 and T2 lots (approximately 5,200 square feet), the minimum and maximum FAR standard will work effectively for smaller-scale 1 and 2 family dwellings while making intensity standards consistent among all T Districts.

Minimum Lot Width. The minimum lot width for 1 and 2 family uses in T1 and T2 is proposed to be revised to be consistent with the changes to minimum lot width for 1 and 2 family uses in the 1-4 Unit Housing Study. The minimum lot width for 1 and 2 family uses in T1 and T2 is proposed to align with the H2 district, with a minimum lot width of 25 feet.

Setback Maximum. The maximum setback is proposed to be 10 feet for all building types other than 1 and 2 family dwellings in T2 and all building types in T3 and T4. This is intended to provide predictability for pedestrian-oriented development built close to the sidewalk and street. There are exceptions if a lot abuts BC or residential zoning, for civic and institutional uses, and for outdoor gathering space, as described in footnote (i) below.

T2 Height Limit. The existing maximum building height for “multifamily” and “nonresidential or mixed-use” development in T2 is 35 feet, and up to 45 feet with a conditional use permit. The conditional use permit process involves a public hearing and can take several months, which can discourage otherwise desirable projects from being proposed. Anecdotally, developers assert that the cost of land, labor, and materials makes building a new development, especially if it has any structured parking, very difficult unless there are at least four stories. Mixed-use projects constructed in Saint Paul neighborhoods from 2015-2020 ranged in height from four to six stories. Planned or approved neighborhood mixed-use projects range in height from five to seven stories.¹ For this reason, a maximum building height of 45 feet is recommended for the proposed “All other” category in T2. By comparison, the maximum building height by right for multifamily is 40 feet in RM1 and 50 feet in RM2.

T3 Height Limit. Similar reasoning, as discussed above, applies to building heights in T3, where the existing maximum building height for multifamily is 45 feet and the maximum building height for mixed-use is 55 feet (and up to 90 feet with a conditional use permit for either type of development). If the “multifamily” and “nonresidential or mixed-use” building types are collapsed into a single category, a single maximum building height needs to be established; 55 feet is recommended (and up to 90 feet with a conditional use permit). This change allows an additional 10 feet of height by right, regardless of if the project includes a commercial component.

T3 Removal of One-Family and Two-Family. Given the intent of the T3 District, which calls for medium-intensity, pedestrian- and transit-oriented commercial, residential, civic, and institutional development, the one-family and two-family dwelling uses are no longer logical as a permitted land

¹ Retail Node and Mixed-Use Case Study, LOCi Consulting, March 9, 2021

use. Of the over 700 properties zoned T3 in the city, only a few dozen include an existing single-family dwelling, so this proposed change will create few nonconformities. Focusing on housing types with greater density in T3 better aligns with the future vision and goals of the city.

Sec. 66.331. – Density and dimensional standards table footnote (a)

Proposed Action: Change “shall be” to “is.”

Background: Updating basic language in footnote (a) provides consistency with other amendments.

Sec. 66.331. – Density and dimensional standards table footnote (b)

Proposed Action: Remove footnote.

Background: Footnote (b) explains calculations for density regulations based on dwelling unit per acre. With the replacement of dwelling unit per acre with FAR, footnote (b) is no longer relevant. This also changes the order of the following footnotes.

Sec. 66.331. – Density and dimensional standards table footnote (c)

Proposed Action: Move FAR reference into table.

Background: Move the minimum 0.5 FAR requirement for light rail station areas into Table 66.331 where the intensity information is located. Since T3 and T4 already have a minimum FAR of 0.5, regardless of proximity to light rail station areas, the FAR minimum is moved to only T2 in the table.

Sec. 66.331. – Density and dimensional standards table footnote (d)

Proposed Action: Update language.

Background: Updating basic language in footnote (d) provides consistency with other amendments.

Sec. 66.331. – Density and dimensional standards table footnote (e)

Proposed Action: Allow structures up to 30 feet high along side and rear property lines adjoining RL-H2 districts at a common property line or alley. Add statement clarifying building heights in master planned areas.

Background: The maximum building height requirement of 25 feet along the side and rear property lines is intended to soften the impact of higher-density residential uses near lower density uses. However, this requirement should not apply to properties across the street from properties in RL-RT2 (now H2 as a result of the 1-4 Unit Housing Study) districts where right-of-way serves as a buffer between development and lower density residential districts. The requirement should apply at a common property line or an alley, not at a street. For example, the Liffey apartment building at the northeast corner of Snelling and Carroll Avenues fronts along Snelling with the side along Carroll. The side was required to be no more than 25 feet in height at the property line due to the RT1 residential zoning district across Carroll to the south. The developer received a variance of this requirement, allowing the building to be 45 feet in height along Carroll (see Figure 2).

The H districts now allow heights of 35–39 feet depending on district and roof type. The T districts should not be more restrictive than the H districts. The maximum allowable height at side and rear property lines should be increased to 30 feet so that buildings are allowed to have similar heights as H districts when accounting for required setbacks. For example, a side or rear setback requirement in a T district may be 6 feet, meaning the building could be 36 feet tall at the setback line.

Current zoning regulations require a conditional use permit for building heights that exceed maximum building heights, even when the building height is stated in, and consistent with, an approved T District master plan. Given that master plans involve comprehensive and detailed analysis of site conditions and opportunities, and undergo an extensive public review process, there is no need to require a conditional use permit for additional height if the height has been considered by the master plan.

Sec. 66.331. - Density and dimensional standards table footnote (f)

Proposed Action: Remove footnote.

Background: A conditional use permit for additional height is no longer needed if 45 feet is the by right maximum building height permitted in T2 (with the amendment discussed above).

Sec. 66.331. - Density and dimensional standards table footnote (new)

Proposed Action: Establish a FAR density bonus for projects that include affordable dwelling units.

Background: The deleted footnote (f) above is replaced by this proposed density bonus amendment. A density bonus is proposed for T1-T3. Ninety-three percent of all T zoned parcels are zoned T1, T2, T3, or T3M, so the density bonus would apply to most land under T zoning. No density bonus is proposed for T4 because it has no maximum FAR, so a FAR bonus would not be an incentive. The proposed amendment is structured with nearly identical language to the density bonus for the RM and H1-H2 districts for consistent administration processes and alignment with the 4d program.

Sec. 66.331. - Density and dimensional standards table footnote (g)

Proposed Action: Allow development at light rail station areas between Lexington Parkway and Marion Street to have the same development potential as other light rail station areas along University Avenue. Add statement clarifying building heights in master planned areas.

Background: Development at light rail station areas should have the same development regardless of location. Similar to the discussion above, building heights stated in an adopted master plan should be allowed by right.

Sec. 66.331. - Density and dimensional standards table footnote (h)

Proposed Action: Add statement clarifying building heights in master planned areas.

Background: Like the discussions above, building heights stated in an adopted master plan should be allowed by right.

Sec. 66.331. - Density and dimensional standards table footnote (i)

Proposed Action: Clarify minimum and maximum setbacks if abutting BC or residential zoning. Clarify the amount of building façade that may exceed the maximum setback. Exempt civic and institutional buildings from the maximum setback requirement. Amend language in design standard

Figure 2: Liffey Apartment Building at Snelling & Carroll Avenue



Sec. 66.343(6) and move it to Table 66.331 footnote (i) (now becoming footnote (h)). Clarify that both the minimum and maximum setback standards apply to the preservation program and design review guidelines.

Background: Instead of determining setbacks based on case-by-case measurements of adjoining property, which can be challenging for applicants and staff, the setback maximums can be increased up to 25 feet to relate to the surrounding context of mixed-use urban neighborhoods. New development should generally be required to be sited within the maximum setback, but there should be flexibility for up to 40 percent of the building façade to exceed the maximum setback to facilitate the development of courtyard buildings, cluster developments, and outdoor dining and gathering spaces. Civic and institutional buildings in T1 and T2 districts should be exempt from the maximum front yard setback requirement. T1 and T2 are widely used and generally appropriate for civic and institutional uses (e.g., churches, colleges, libraries, etc.), which typically have larger front setbacks and open space. The relocated design standard language relates to setback maximums on corner lots at transit platforms so is more appropriate in this footnote (more information on reorganized and revised design standards can be found below).

Sec. 66.331. – Density and dimensional standards table footnote (j)

Proposed Action: Update language.

Background: Updating basic language in footnote (j) provides consistency with other amendments.

Sec. 66.331. – Density and dimensional standards table footnote (k)

Proposed Action: Update language.

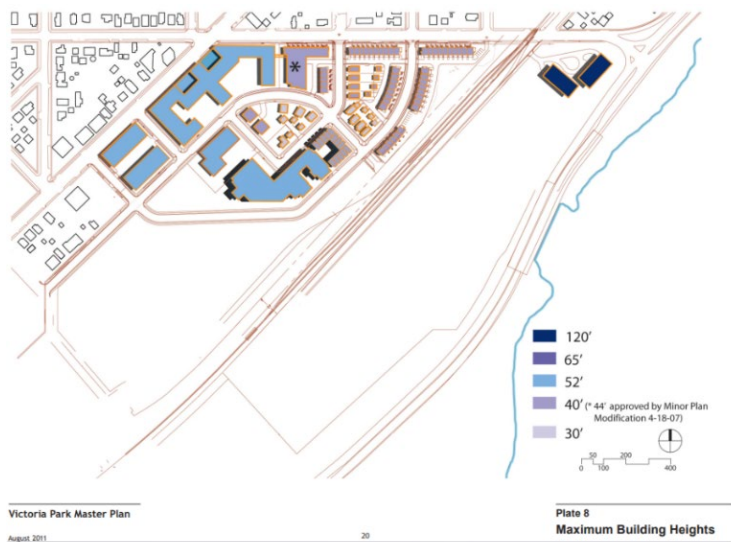
Background: Updating basic language in footnote (k) provides consistency with other amendments.

Sec. 66.331. – Density and dimensional standards table footnote (l)

Proposed Action: Remove footnote.

Background: A newly proposed provision in Sec. 66.331 footnote (g), discussed above, allows a height stated in an adopted master plan to exceed the height limit for the district in Table 66.331. Consequently, the building height limits for the master plans detailed in footnote (l) are no longer needed. Figure 3 provides an example of master plan building heights.

Figure 3: Victoria Park Master Plan Building Heights Example



Required Conditions in Traditional Neighborhood Districts: Sec. 66.340

Sec. 66.341. – Required Conditions in T1-T2 traditional neighborhood districts, and Sec. 66.342. – Parking requirements in T3–T4 traditional neighborhood districts.

Proposed Action: Move the parking design standard from Sec. 66.343 to the required conditions section since both Sec. 66.341 and 66.342 address parking placement. Remove conditional use permit requirement for conversion of commercial buildings in T1 and T2.

Background: The design standard for proximity of parking to a corner should be moved from design standards (Sec. 66.343) to consolidate and clarify all T district parking conditions in one location. The conditional use permit requirement for conversions of commercial buildings to more than 50 percent residential use in T1 and T2 has not proven to be useful in practice and can be deleted, especially since the remainder of subsection (c) ensures quality building form.

Traditional Neighborhood District Design Standards: Sec. 66.343

Sec. 66.343(a). – Traditional Neighborhood District Design Standards, Applicability.

Proposed Action: Amend the introduction to remove subjective language. Delete, move, and consolidate standards where appropriate.

Background: The T District design standards apply to development within T1-T4 districts. Sec. 66.343(a) discusses the applicability of the design standards. Table 66.343 lists the 23 categories of design standards and identifies which standards apply in each T District. Sec. 66.343(b) describes each of the design standards in detail. Some unclear introductory language suggests that DSI staff should decide whether there are circumstances unique to the property that call for a design standard to be varied (i.e., a site or proposal does not have to be consistent with design standards). This is a role more effectively handled by the Board of Zoning Appeals or Planning Commission using established findings to evaluate requests, rather than subjectively by staff. There is overlap between regulations in the T District design standards (Sec. 66.343) and the regulations in the building design standards (Sec. 63.110). Consolidated standards will be clearer and more efficient. With the consolidation and streamlining of design standards, it is now more logical for all amended design standards to apply to all T Districts, so there is no longer a need for a table that illustrates design standard applicability.

Sec. 66.343(b)(1). – Land Use Diversity.

Proposed Action: Remove design standard.

Background: This design standard applies to T3 and T4 districts. While land use diversity is desirable, land uses are more appropriately regulated in the land use table. This design standard is also difficult to administer because most zoning applications involve a single lot.

Sec. 66.343(b)(2). – Transitions to Lower-Density Neighborhoods.

Proposed Action: Remove design standard.

Background: This design standard applies to T2-T4 districts. This standard is difficult to administer because it is subjective and lacks specificity for what is and is not acceptable.

Sec. 66.343(b)(3). – Block Length.

Proposed Action: Move design standard to Chapter 69, Subdivision Regulations.

Background: This design standard applies to T2-T4 districts. The standard for block length is proposed to be moved from the T District design standards to the subdivision regulations in Chapter 69, where block length is regulated citywide. Discussion of the proposed amendment is located in the section of this memo related to Chapter 69.

Sec. 66.343(b)(4). – Compatible Rehabilitation and Reuse.

Proposed Action: Clarify characteristics of “traditional buildings.”

Background: This design standard applies to all T Districts. DSI staff requested clarification on the purpose and intent of “traditional buildings.”

Sec. 66.343(b)(5). – Use Established Building Façade Lines.

Proposed Action: Remove design standard.

Background: This design standard applies to T1-T3 districts. Front yard setbacks are regulated in Table 66.331 and footnote (i) and achieve the goal of having setbacks for new buildings relate to the setbacks of existing buildings on a block.

Sec. 66.343(b)(6). – Buildings Anchor the Corner.

Proposed Action: Remove design standard.

Background: This design standard applies to all T Districts. The building design standards (Sec. 63.110) already address the need for buildings on corner lots to “hold the corner.” Additional proposed language in the amendments to Sec. 63.110 call for facades, frontages, and/or projections within 15 feet of the lot line along both streets to establish a relationship between the building and the sidewalks. The portion of the design standard dealing with corner lots at light rail station platforms is proposed to be moved and integrated into footnote (i) of Table 66.331.

Sec. 66.343(b)(7). – Front Yard Landscaping.

Proposed Action: Add a statement to increase safety in publicly accessible private spaces.

Background: This design standard applies to all T Districts. The amendment is proposed in an effort to better address strategies related to crime prevention through environmental design.

Sec. 66.343(b)(8). – Building Façade Continuity.

Proposed Action: Update language.

Background: The existing design standard applies to T2-T4 districts. With the removal of the applicability table, as discussed above, this design standard is proposed to apply to all T districts.

Sec. 66.343(b)(9). – Building Façade Articulation.

Proposed Action: Revise to better address frontages. Update the base requirement to 30 feet.

Background: This design standard applies to all T Districts. It should be refocused on pedestrian-oriented frontage elements on the base of buildings, aligning the dimension (30 feet) with other recent Zoning Code amendments (i.e., East Grand Avenue Overlay District). This standard works together with the building design standards (Sec. 63.110) and other T District standards that address elements related to the human scale (e.g., primary entrance features/frontages, transparency, etc.).

Sec. 66.343(b)(10). – Building Height – Treatment of 1-Story Buildings.

Proposed Action: Clarify regulations for one-story buildings vs. two-story buildings.

Background: This design standard applies to all T Districts. It should more effectively address one-story and two-story buildings and design elements.

Sec. 66.343(b)(11). – Definition of Residential Entries.

Proposed Action: Remove design standard.

Background: This design standard applies to all T Districts. The building design standards in Sec. 63.110 adequately address this standard.

Sec. 66.343(b)(12). – Entrance Location.

Proposed Action: Add “nonresidential” for clarity and add flexibility for entrances facing pedestrian-oriented courtyards.

Background: This design standard applies to all T Districts. The word “nonresidential” is inserted to make it clear that in multi-tenant buildings any ground floor nonresidential use with street frontage must have an entrance facing the street. Ground floor nonresidential uses in multi-tenant buildings should have an entrance facing the street for pedestrian access, but multifamily residential uses should not be required to do so, as it may not be appropriate for some housing types, like a courtyard building. This amendment also provides flexibility for a building entrance to face an outdoor pedestrian-oriented courtyard on a primary street frontage, not only a street.

Sec. 66.343(b)(13). – Door and Window Openings – Minimum and Character.

Proposed Action: Remove overly prescriptive standards and move standard related to glass opacity to the building design standards (Sec. 63.110(c)).

Background: This design standard applies to all T Districts. The requirement for windows to be designed with punched and recessed openings is removed because the design standard is too prescriptive and may not be appropriate for all buildings.

Sec. 66.343(b)(14). – Materials and Detailing.

Proposed Action: Clarify materials list and allow synthetic stucco as an acceptable material.

Background: This design standard applies to all T Districts. Synthetic stucco products have improved and issues with water retention have been addressed since the adoption of this standard, so this material is proposed to be removed from the list of buildings materials that are not allowed. Other amendments are proposed for consistency with Section 66.542.

Sec. 66.343(b)(15). – Screening of Equipment and Service Areas.

Proposed Action: Update language.

Background: The existing design standard applies to T2-T4 districts. With the removal of the applicability table, as discussed above, this design standard is proposed to apply to all T districts.

Sec. 66.343(b)(16). – Interconnected Street and Alley Network.

Proposed Action: Remove obsolete street type references.

Background: The existing design standard applies to T2-T4 districts. With the removal of the applicability table, as discussed above, this design standard is proposed to apply to all T districts. References to options other than the existing street and alley network are removed, except for cul-de-sac streets, which are still allowed but continue to be discouraged. An example of a cul-de-sac in

a T District is the stretch of Asbury Street west of Allianz Field, where MnDOT restricts access to Snelling Avenue. Chapter 69 of the Zoning Code, which relates to subdivision regulations, addresses street and alley standards, alignment, and widths. Sec. 69.501 calls for streets to connect or terminate at other streets to the extent possible and discourages cul-de-sac streets except where traffic safety or physical site constraints make them necessary.

Sec. 66.343(b)(17). – On-Street Parking.

Proposed Action: Remove design standard.

Background: This design standard applies to T2-T4 districts. It poses public right-of-way requirements rather than private development requirements and it is difficult to administer. The Street Design Manual should govern in this case, per Public Works.

Sec. 66.343(b)(18). – Parking Location and Entrance Design.

Proposed Action: Revise to only apply to structured parking. Add requirement for structured parking to be designed with level floors. Move surface parking provisions to Sec. 66.341 and 66.342, which address parking placement.

Background: This design standard is amended to apply only to structured parking in T Districts. Structured parking should be designed with level floors so it can be converted to other uses if parking is no longer needed, and the design is determined cost-effective. This requirement exists for the Highland Bridge and United Village master planned areas.

Sec. 66.343(b)(19). – Residential Garage Location.

Proposed Action: Revise the title to refer to one- or two-family garages. Address corner lots.

Background: This design standard applies to all T Districts. The title is amended to clarify applicable housing types. A statement is added to clarify that corner lots may be accessed from the side street.

Sec. 66.343(b)(20). – Parking Lot Lighting.

Proposed Action: Update language.

Background: The existing design standard applies to T2-T4 districts. With the removal of the applicability table, as discussed above, this design standard is proposed to apply to all T districts.

Sec. 66.343(b)(21). – Entrance Location for Transit Access.

Proposed Action: Clarify applicability for direct access to all modes of transit.

Background: This design standard applies to all T Districts. The standard should apply to all transit modes, such as light rail, bus, BRT, and streetcar, and should call for building entrances to provide direct access to transit stations.

Sec. 66.343(b)(22). – Street Trees.

Proposed Action: Remove unnecessary references and explanations.

Background: This design standard applies to all T Districts. The amendments provide streamlining.

Sec. 66.343(b)(23). – Sidewalks.

Proposed Action: Clarify sidewalk widths in certain T Districts.

Background: This design standard applies to all T Districts. The standard is amended to call for specific sidewalk widths in certain T Districts and provide a reference to the Street Design Manual for additional information on specific requirements.

Sec. 66.344. – Traditional Neighborhood District Planning Requirements.

Proposed Action: Replace reference to “precinct plan” with “district plan.” Clarify expectations related to block-level analyses. Improve language consistency related to “modifications” vs. “amendments.” Introduce provisions for administrative modifications of T District design standards in master planned areas.

Background: The term “precinct plan” is not typically used for plans related to T Districts, while “district” plan is a term used regularly. The portion of this section dealing with master plans references a block-level analysis that designates blocks or portions of blocks as “mixed residential,” “mixed-use,” “edge,” and “transition.” In practice, block-level analysis has been more general, referencing primary building types and land uses on each block but without these particular context labels. The language used for changes to master plans is revised from “modification” to “amendment” to be consistent with the language used in Sec. 66.951. New modifications of T District design standards in areas with an approved master plan could be approved administratively by the planning administrator to streamline the review process and facilitate efficient development of master planned areas. The changes would allow for additional design flexibility to respond to unforeseen design challenges and/or changing market conditions. The modifications would be required to be consistent with the Comprehensive Plan and approved master plan. This type of modification would not allow changes to public infrastructure.

Sec. 66.345. – Traditional Neighborhood District Master Plan Elements.

Proposed Action: Remove section.

Background: In practice, the provisions in Sec. 66.345 have not been used or applied to a T3M or T4M district. T District master plans are designed to fit the context and needs of a particular site. The generic standards in Sec. 66.345 have never been appropriate for this and are superfluous code language that should be deleted.

Amendments to Other Chapters of the Zoning Code Related to T Districts

This section describes proposed amendments to sections of the Zoning Code that are affected by text amendments to T Districts, including projections into yards, building design standards, uses, and subdivisions. Each amendment’s proposed action is listed, followed by any relevant background information. See Attachment 1 for redlines of proposed amendments.

Construction of Language: Sec. 60.104

Proposed Action: Update construction of language terms.

Background: Planning staff is updating Code verbiage to conform to modern industry standards. Overall, the term “must” should be used rather than “shall.” In other cases, “should” or “may” are also replaced by “must” for clarity of implementation.

Projections into Yards: Sec. 63.106

Proposed Action: Clarify balcony projections and lot coverage applicability.

Background: For privacy purposes, balconies should not be allowed to project closer than two feet from a property line. The 1-4 Unit Housing Study included an amendment to allow balconies on the second floor and above to project into a required yard along a street or an alley. While the amendment did not state whether balconies should be subject to lot area requirements, the intent was for balconies to be exempt since they are above the first story.

Building Design Standards: Sec. 63.110

Proposed Action: Consolidate design standards. Clarify pedestrian-oriented standards for primary entrances. Require nonresidential buildings to allow views into and out of the building interior. Clarify primary entrance vs. setback requirements, including requirements for holding the corner.

Background: There is overlap between T District design standards (Sec. 66.343) and the building design standards (Sec. 63.110). Consolidating the T District and building design standards is proposed for clarity and efficiency in the code. This is also discussed in the section of the memo related to T District design standards.

Primary entrances must be located within the front third of the structure for easy pedestrian access, but it is acceptable for them to be located off a courtyard. Primary entrances should have frontage elements that relate to the human scale. Connections to the abutting sidewalk and driveways should be made with limited instances where pedestrians would need to cross drives or other vehicle movements. Windows in nonresidential buildings should allow views into and out of the building interior to increase walkability and safety. Using “pedestrian-oriented commercial districts” as the determinant for setback applicability is subjective and confusing. Setback standards are established in the dimensional standards table, so the standards in this section are clearer if focused on primary entrances on blocks with existing development. For development sites on corners, buildings should be required to hold the corner and establish a relationship between the building and the sidewalk.

Land Use Definition and Development Standards: Chapter 65

Sec. 65.130. – Cluster development.

Proposed Action: Add land use standards for T Districts.

Background: Cluster developments are a neighborhood-scale multi-unit housing type appropriate in T districts. The use is being proposed to be added to the use table in Sec. 66.321 and therefore requires an amendment in the use standards to acknowledge the T District dimensional standards that differ from the RL-H2 dimensional standards (e.g., FAR vs. lot area per unit).

Sec. 65.412. – General retail.

Proposed Action: Update “general retail” to better accommodate neighborhood-scale uses.

Background: Including “leathergoods” in the general retail land use category helps clarify that this specific use is permissible where general retail is allowed. To better accommodate neighborhood-scale retail uses in T1 contexts, a maximum threshold of 5,000 square feet is proposed.

Sec. 65.515. Farmers market.

Proposed Action: Update land use standard to remove conditional use permit applicability.

Background: Farmers markets are a temporary use that support small-scale, local entrepreneurs. The T Districts should be the most flexible and accessible zoning districts to accommodate this use in the city. This amendment removes the possible conditional use permit requirement (see above) and allows farmers markets with more than five vendors in T Districts by right.

Sec. 65.613. – Coffee shop, tea house.

Proposed Action: Increase size of coffee shops allowed in T1. Delete reference to accessory cabaret.

Background: Saint Paul has precedent for many neighborhood-scale coffee shops over 800 square feet that would be appropriate in T1 areas. Increasing the threshold to 1,500 square feet allows more flexibility for coffee shops and tea houses in small-scale urban neighborhoods.

Sec. 65.614. – Restaurant, Sec. 65.780. – Limited production and processing, and Sec. 65.782. – Printing and publishing.

Proposed Action: Clarify applicability of standards for a conditional use permit.

Background: These uses are identified as P/C (permitted/conditional) for T2-T4 districts in the use table (Sec. 66.321). The conditions for the uses require a conditional use permit in T2 and T3 for projects of more than 15,000 square feet; the language is silent on the standards and conditions in T4. The amendment is recommended to consistently regulate the uses with other similar uses, like larger general retail, craft brewery, and agriculture uses. T4 districts are not necessarily intended for larger uses, but the development height and intensity are larger and more flexible. The development pattern sought in T Districts in general is equally desirable in T4 as it is in T2 and T3 districts.

Sec. 65.785. – Storage facility, rental.

Proposed Action: Rework storage facility uses to be more appropriate for mixed-use developments.

Background: The Zoning Code was amended several years ago to allow rental storage facility as a permitted use in B4 and B5 (it was previously just an industrial use) because a self-storage business was proposed in the Custom House downtown, which all parties agreed was logical. It was recognized that urban living, including people who may be downsizing, creates demand for self-storage and that it is inefficient to relegate storage to only industrial areas. It was also agreed that the negative impacts could be controlled by limiting the size of storage facilities in mixed-use buildings and ensuring active ground floor areas are maintained. This can also apply to the more intense T Districts, as over time there may be demand for limited storage uses as part of a mixed-use development in appropriate sites along dense transit corridors.

Residential District Dimensional Standards: Sec. 66.231

Proposed Amendment: Update language related to income restrictions for consistency.

Background: The proposed amendment to the RM affordable housing density bonus is intended to clarify what is required for income restrictions on affordable units and make the language consistent with the existing H1/H2 density bonus and the proposed T District density bonus.

Multiple-Family Design Standards: Sec. 66.241

Proposed Action: Update cross-references.

Background: Since some of the T Districts standards apply to RM districts, the cross-references in this section need to be amended to be consistent with the amendments in the T Districts.

Business District Use Table: Sec. 66.421

Proposed Action: Update use table for consistency.

Background: Remove “mail order house” as it is an obsolete land use. The Zoning Code was amended several years ago to allow rental storage facility as a permitted use in B4 and B5. The land use is being modified to better acknowledge mixed-use development. See discussion above related to the T Districts for more information.

EG East Grand Avenue Overlay District: Sec. 67.600

Proposed Action: Remove reference to T “2” design standards.

Background: The East Grand Avenue Overlay District was amended in August 2024. The amendments maintained a reference to T2 design standards, subjecting all new development within the overlay boundary to the list of design standards applicable to T2. Given the removal of the T District design standard applicability table, as discussed above, it is no longer necessary or relevant to indicate a specific set of zoning district design standards that must be followed.

Subdivision Regulations: Blocks: Sec. 69.507

Proposed Action: Consolidate block length standards in this section.

Background: For efficiency, the T District design standard related to block length is proposed to be moved from the design standards section in Chapter 66 to the subdivision regulations in Chapter 69, where block length is regulated. The existing maximum block length in 69.507 for residential areas is 1000 feet. The proposed amendments to Sec. 69.507 changes this to a range with a maximum of 660 feet to better align with the length of existing blocks in the city.

Subdivision Regulations: Street Trees: Sec. 69.600

Proposed Action: Update standards to align with City Forestry practices.

Background: City Forestry staff prepared proposed language to provide more flexibility for allowable tree species and remove ash trees from being allowed.

CNPC RECOMMENDATION

The Comprehensive and Neighborhood Planning Committee recommends that the Planning Commission provide a recommendation of approval to the City Council on the Traditional Neighborhood District Zoning Study.

PLANNING COMMISSION REVIEW SCHEDULE

Comprehensive and Neighborhood Planning Committee Review – April 2025

Planning Commission Release for Public Review and Set Public Hearing – April 2025

Outreach and engagement with community district councils, development community, and the Business Review Council during public review period prior to the Planning Commission public hearing – May 2025

Planning Commission Public Hearing – Summer 2025

Comprehensive and Neighborhood Planning Committee Review of Public Hearing Testimony and Recommendation – Summer 2025

Planning Commission Action on Committee Recommendation – Summer 2025

ATTACHMENTS

1. Proposed Amendments
2. Planning Commission Resolution Initiating the T District Zoning Study
3. 2040 Comprehensive Plan Policies
4. Community Outreach Summary
5. Planning Commission Public Hearing Testimony

ARTICLE III. 66.300. TRADITIONAL NEIGHBORHOOD DISTRICTS

Division 1. 66.310. Intent

Sec. 66.311. General intent, T traditional neighborhood districts.

~~TN-T~~Traditional neighborhood districts are intended to foster ~~the development and growth of~~ compact, pedestrian-oriented ~~urban villages~~ development in neighborhood nodes, along transit corridors, and at large redevelopment sites. All four (4) districts are intended to encourage a compatible mix of commercial, and residential, civic, and institutional uses within buildings, sites and blocks; new development in proximity to major transit streets and corridors; and additional choices in housing.

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.312. Intent, T1 low-intensity traditional neighborhood district.

The T1 traditional neighborhood district ~~is intended to provide~~s for neighborhood-scale compact, pedestrian-oriented mixed-use areas ~~of limited size~~, with a variety of residential, office, and service, civic, and institutional uses ~~that primarily serve neighborhood needs~~. It is also intended for corner commercial buildings in residential areas and to serve as a transitional use of land along major thoroughfares, and between commercial or industrial districts and residential districts ~~or other less intensive land uses~~.

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.313. Intent, T2 medium-intensity traditional neighborhood district.

The T2 traditional neighborhood district ~~is designed for use in existing or potential pedestrian and transit nodes. Its intent is to foster and support~~ provides for medium-intensity compact, pedestrian-oriented commercial, and residential, civic, and institutional development that, ~~in turn, can support~~s and increase transit usage. It is intended primarily for neighborhood nodes and along existing or planned transit corridors. It encourages, ~~but does not require, pedestrian-oriented development with~~ a variety of uses and housing types, withand appropriate careful attention to the amount and placement of parking and transitions to adjacent residential neighborhoods.

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.314. Intent, T3 medium-intensity traditional neighborhood district.

The T3 traditional neighborhood district provides for medium-intensity~~higher density pedestrian and transit oriented~~ residential and commercial mixed-use development in higher intensity neighborhood nodes and transit corridors. ~~It is designed for~~ encourages transit-oriented development with a variety of land uses and higher density housing types to accommodate households of varying sizes, ages, and incomes. development or redevelopment of land on sites large enough to support:

- ~~(a) A mix of uses, including residential, commercial, civic and open space uses in close proximity to one another;~~
- ~~(b) A mix of housing styles, types and sizes to accommodate households of varying sizes, ages and incomes;~~
- ~~(c) A system of interconnected streets and paths that offer multiple routes for motorists, pedestrians and bicyclists, and are connected to existing and future streets;~~
- ~~(d) A system of open space resources and amenities; and incorporation of environmental features into the design of the neighborhood.~~

~~The T3 district is also intended for smaller sites in an existing mixed-use neighborhood center where some of the above elements already exist, or in an area identified in the comprehensive plan as a potential "urban village" site. The above elements may be found within the T3 district or adjacent to it; the intent is that all would be present within a reasonable walking distance.~~

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.315. Intent, T4 high-intensity traditional neighborhood district.

The T4 traditional neighborhood district provides for high-~~intensity-density~~, transit-supportive, pedestrian-friendly mixed-use development. It is particularly intended for use near ~~transit stops along fixed rail transit (including commuter rail, light rail and trolley) corridors, existing and planned transit corridors~~ where a ~~greater~~more frequent transit service and reliance on transit makes high-~~density-intensity~~ mixed-use development possible and desirable.

(Ord. No. 11-27, § 1, 4-20-11)

Division 2. 66.320. Principal Uses in Traditional Neighborhood Districts

Sec. 66.321. Traditional neighborhood district use table.

Table 66.321, traditional neighborhood district uses, lists all permitted and conditional uses in the T1—T4 traditional neighborhood districts, and notes applicable development standards and conditions.

Table 66.321. Traditional Neighborhood District Uses

Use	T1	T2	T3	T4	Definition (d) Standards (s)
Residential Uses					
Dwellings					
One-family dwelling	P	P	P		(d), (s)
Two-family dwelling	P	P	P		(d)
<u>Cluster development</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>(d), (s)</u>
Multiple-family dwelling	P	P	P	P	(d)
Housing for the elderly	P	P	P	P	(d)
Mixed Commercial—Residential Uses					
Home occupation	P	P	P	P	(d), (s)
Live-work unit	P	P	P	P	(d), (s)
Mixed residential and commercial use	P	P	P	P	
Congregate Living					
Adult care home	P/C	P	P	P	(d), (s)
Community residential facility, licensed correctional	C	C	C	C	(d), (s)
Dormitory	P/C	P	P	P	(d), (s)
Emergency housing facility	P/C	P/C	P/C	P/C	(d), (s)
Foster home	P	P	P	P	(d)
Fraternity, sorority	P/C	P	P	P	(d), (s)
Roominghouse	C	C	C	C	(d), (s)
Shelter for battered persons	P/C	P/C	P/C	P/C	(d), (s)
Sober house	P/C	P/C	P/C	P/C	(d), (s)
Supportive housing facility	P/C	P	P	P	(d), (s)
Civic and Institutional Uses					
Club, noncommercial		P	P	P	(d)
College, university, seminary, or similar institution of higher learning	P	P	P	P	(d)
Community center	P	P	P	P	(d), (s)
Day care	P	P	P	P	(d), (s)
Homeless services facility	P/C	P/C	P/C	P/C	(d), (s)
Museum	P/C	P	P	P	(s)
Public library	P	P	P	P	

Public and private park, playground	P	P	P	P	
Religious institution	P	P	P	P	(d)
School, primary & secondary	P	P	P	P	
Trade school, arts school, dance school, etc.	P	P	P	P	
Public Services and Utilities					
Antenna, cellular telephone	P/C	P/C	P/C	P/C	(d), (s)
Municipal building or use	P	P	P	P	(s)
Solar energy generation facility, community	P/C	P/C	P/C	P/C	(d), (s)
Utility or public service building	C	C	C	C	(d), (s)
Commercial Uses					
Office, Retail, and Service Uses					
General office, studio	P	P	P	P	(d)
General retail	<u>P</u>	P/C	P/C	P/C	(d), (s)
Service business, general	P	P	P	P	(d)
Service business with showroom or workshop		P/C	P/C	P/C	(d), (s)
Animal boarding			P		(d), (s)
Animal day care	<u>P</u>	<u>P</u>	P	P	(d), (s)
Artist's studio	P	P	P	P	(d)
Business sales and services		P	P		(d)
Drive-through sales and services, principal and accessory		C			(s)
Dry cleaning, commercial laundry		P	P	P	(s)
Farmers market	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	(d), (s)
Garden center, outdoor		P	P	P	(d), (s)
Hospital		C	C	C	(d)
Mortuary, funeral home		P	P	P	
Outdoor uses, commercial		P/C	P/C	P/C	(d), (s)
Tattoo shop	<u>P</u>	P	P	P	
Tobacco products shop		P/C	P	P	(d), (s)
Veterinary clinic		P	P	P	(d), (s)
Food and Beverages					
Bar		P/C	P/C	P/C	(d), (s)
Brew on premises store		P	P	P	(d), (s)
Coffee shop, tea house	P/C	P/C	P/C	P/C	(d), (s)
Restaurant		P/C	P/C	P/C	(d), (s)
Restaurant, fast food		P/C	P/C	P/C	(d), (s)
Commercial Recreation, Entertainment and Lodging					
Bed and breakfast residence	P	P	P	P	(d)
Hotel		P	P	P	(d)
Short term rental dwelling unit	P/C	P/C	P/C	P/C	(d), (s)
Health/sports club	<u>P</u>	P	P	P	(d)
Indoor recreation		C	C	C	(d), (s)
Outdoor sports/entertainment				P	(s)
Reception hall/rental hall		C	C	C	
Theater, assembly hall		P/C	P/C	P/C	(s)
Automobile Services					
Auto body shop				C	(d), (s)
Auto convenience market		C	C		(d), (s)
Auto service station		C	C		(d), (s)
Parking Facilities					

Parking facility, commercial		C	C	C	(d), (s)
Transportation					
Bus or railroad passenger station			C	C	
Railroad right-of-way	C	C	C	C	(s)
Limited Production and Processing					
Agriculture	P/C	P/C	P/C	P/C	(d), (s)
Brewery, craft		P/C	P/C	P/C	(d), (s)
Distillery, craft		P/C	P/C	P/C	(d), (s)
Limited production and processing		P/C	P/C	P/C	(d), (s)
Mail order house		P	P	P	
Printing and publishing		P/C	P/C	P/C	(s)
Storage facility, mixed-use			P	P	(d), (s)
Winery, craft		P/C	P/C	P/C	(d), (s)
Accessory Uses					
Accessory use	P	P	P	P	(d), (s)
Dwelling unit, accessory	P	P	P		(d), (s)
Micro-unit dwellings accessory to a religious institution	P	P	P	P	(d), (s)

P - Permitted use C - Conditional use requiring a conditional use permit

Notes to table 66.321, principal uses in traditional neighborhood districts:

(d) Definition for the use in Chapter 65, Land Use Definitions and Development Standards.

(s) Standards and conditions for the use in Chapter 65, Land Use Definitions and Development Standards.

(C.F. No. 08-640, § 4, 7-9-08; Ord No. 11-26, § 2, 3-23-11; Ord No. 11-27, § 1, 4-20-11; Ord No. 12-26, § 1, 5-23-12; Ord 13-44, § 2, 8-28-13; Ord 13-51, § 5, 11-13-13; Ord 13-57, § 3, 12-4-13; Ord 15-5, § 3, 2-5-15; Ord 16-5, § 1, 4-13-16; Ord 16-25, § 1, 8-17-16; Ord 16-13, § 5, 9-14-16; Ord 17-1, § 3, 1-25-17; Ord 17-38, § 4, 10-25-17; Ord 19-10, § 1, 6-26-19; Ord 19-72, § 2, 1-8-20; Ord 22-3, § 1, 1-19-22; Ord 21-33, § 1, 11-10-21; Ord 23-43, § 7, 10-18-23; Ord 23-57, § 3, 12-13-23)

Division 3. 66.330. Traditional Neighborhood District Density and Dimensional Standards

Sec. 66.331. - Density and dimensional standards table.

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

Table 66.331. Traditional Neighborhood District Dimensional Standards

Building Type by Zoning District	Density/Intensity	Lot Area/Size Minimum (per principal unit)	Lot Width Minimum	Building Height (feet)		Yard Setbacks (feet)		
	Min.—Max.(a)	Area (sq. ft.)(a)	Width (feet)	Min.	Max.	Front Min.—Max.	Side Min.	Rear Min.
T1								

1- & 2-family dwelling	6—12 units/acre (b) 0.3-1.0 FAR (e)	3500 <u>1000</u> (b)	30 25	none	35 (ed)	105—25 (ih)	(kj)	15
2-family /townhouse	8—20 units/acre (b)	2000 (b)	20	none	35 (e)	40—25 (i)	(k)	15
Multifamily All other	10—25 units/acre (b) 0.3-1.0 FAR (e)	1700 (b) n/a	n/a	none	35 (ed)	40—25 (ih)	(kj)	(kj)
Nonresidential or mixed-use	0.3—1.0 FAR	n/a	n/a	none	35 (e)	0—25	(k)	(k)
T2								
1- & 2-family dwelling	6—12 units/acre (b) 0.3-1.0 FAR (e)	3500 <u>1000</u> (b)	30 25	none	35 (ed)	105—25 (ih)	(kj)	15
2-family /townhouse	8—20 units/acre (b)	2000 <u>1000</u> (b)	20 25	none	35 (e)	40—25 (i)	(k)	15
Multifamily	FAR as for mixed-use	n/a	n/a	none	35 (e), (f)	40—25 (i)	(k)	(k)
Nonresidential or mixed-use All other	0.3—2.0 FAR with surface parking, 0.3—3.0 FAR with structured or no parking, and 0.5 min. FAR in light rail station areas (eb), (e)	n/a	n/a	none	435 (ed), (f)	0—10 (jh), (i)	(kj)	(kj)
T3								
1-family dwelling	8—12 units/acre (b)	3500 (b)	30	25	35 (e)	15—25 (i)	(k)	15
2-family /townhouse	10—20 units/acre (b)	2000 (b)	20	25	35 (e)	40—25 (i)	(k)	15
Multifamily	0.5—3.0 FAR (d)	n/a	n/a	25	45 (e), (g), (h)	40—25 (i)	(k)	(k)
Nonresidential or mixed-use All	0.5—3.0 FAR (dc), (e)	n/a	n/a	25	55 (ed), (gf), (h)	0—10 (jh), (i)	(kj)	(kj)
T4								
Multifamily	0.5 min. FAR (d)	n/a	n/a	25	75 (e), (h)	40—25 (i)	(k)	(k)
Nonresidential or mixed-use All	0.5 min. FAR (dc)	n/a	n/a	25	75 (ed), (hg)	0—10 (jh), (i)	(kj)	(kj)

Min. - Minimum Max. - Maximum FAR - Floor Area Ratio n/a - not applicable

Notes to table 66.331, traditional neighborhood district dimensional standards:

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

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

~~In calculating the area of a lot for the purpose of applying lot area and density requirements, the lot area figure may be increased by six hundred (600) square feet for each parking space (up to one (1) parking space per unit) within a multiple-family structure or a structured parking facility. The maximum number of units possible on a lot using this lot area bonus can be calculated using the formula: Maximum units allowed = Lot Area ÷ (minimum lot area per unit - 600).~~

(eb) Floor area ratio (FAR) ~~shall~~ must be prorated upon the percentage of parking that is provided as structured parking. ~~A minimum FAR of 0.5 is required in light rail station areas.~~ Thirty (30) percent of the floor area of structured parking within, above, or below the principal structure may be counted toward meeting the minimum FAR.

(ec) 1.0-3.0 FAR in light rail station areas for lots more than twenty-five thousand (25,000) square feet in area, with no maximum FAR in T4. The floor area of structured parking above or below space used for principal uses, up to an amount equal to the floor area of the principal uses, may be counted toward meeting the minimum FAR. For lots more than twenty-five thousand (25,000) square feet partly in a light rail station area, minimum FAR ~~shall~~ must be prorated upon the percentage of the lot in a light rail station area.

(ed) ~~Except in the river corridor overlay district, h~~Height of structures may exceed the maximum if set back from side and rear setback lines a distance equal to additional height. Structures ~~shall~~ must be no more than ~~twenty-five (25) thirty (30)~~ feet high along side and rear property lines ~~abutting~~ adjoining RL-H2RT2 residential districts at a common property line or alley; structures may exceed this ~~twenty-five (25) thirty (30)~~ foot height limit if stepped back from side and rear property lines a distance equal to the additional height. Additional building height is permitted when stated in an adopted T District master plan.

(fe) ~~A maximum height of forty-five (45) feet may be permitted with a conditional use permit. In T1 - T3, the FAR maximum may be increased by 0.5 if at least ten (10) percent of new dwelling units are leased at a rate at or below the sixty (60) percent of the area median income (AMI) rent limits as defined by the Multifamily Tax Subsidy Program rent and income limits published by Minnesota Housing, and are affordable to households earning up to sixty (60) percent of the area median income for at least ten (10) years. The FAR maximum may be increased by an additional 0.5 (total of 1.0 increase) if at least twenty (20) percent of new dwelling units are leased at a rate at or below the sixty (60) percent of the area median income (AMI) rent limits as defined by the Multifamily Tax Subsidy Program rent and income limits published by Minnesota Housing, and are affordable to households earning up to sixty (60) percent of the area median income for at least ten (10) years. Each unit required to be affordable must be occupied by a household earning up to sixty (60) percent of the area median income. Prior to issuance of a building permit for the new building (or building expansion or conversion), demonstration of the commitment to affordable housing in accordance with this footnote must be provided as a deed restriction or other contractual agreement with the city, or a city housing and redevelopment authority financing agreement or other similar financing agreement. Upon occupancy of the units, documentation of the households' income qualifications is required.~~

~~(gf) Except in the river corridor overlay district and within light rail station areas between Lexington Parkway and Marion Street, a~~ maximum height of ninety (90) feet may be permitted with a conditional use permit. Structures ~~shall~~must be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height. Additional building height is permitted when stated in an adopted T District master plan.

(hg) Additional height may be permitted with a conditional use permit. Structures ~~shall~~must be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height. Additional building height is permitted when stated in an adopted T District master plan.

~~(ih) Where at least fifty (50) percent of the front footage of any block is built up with principal residential buildings and the front yard setbacks of existing buildings with front yards that adjoin the front yard of the lot are all greater or all less than the district standard setback requirement, the minimum front yard setback for new buildings shall be the same as the adjoining front yard setback that is closest to the district standard setback requirement, except where only one existing front yard adjoins the front yard of the lot the minimum front yard setback for new buildings shall be the midpoint between the district standard setback requirement and the adjoining front yard setback. The property owner is responsible for reporting the relevant adjacent existing front setback to the zoning administrator on a registered land survey.~~ The minimum front yard setback ~~shall~~must not exceed the maximum front yard setback requirement. If an interior lot is abutting BC or residential zoning, it may have setbacks up to twenty-five (25) feet to relate to the existing established building façade line. Sixty (60) percent of the front facade must fall within the maximum setback. Up to forty (40) percent of the building façade on any lot may exceed the maximum setback to create outdoor seating, gathering areas, or courtyards. Civic and institutional buildings in T1 and T2 districts are exempt from the maximum front yard setback requirement. On corner lots at transitway platforms, no portion of a structure is allowed in the triangular area of the lot included within fifteen (15) feet of the corner along each lot line. For local heritage preservation sites, the minimum and maximum setback standards may be modified to comply with the preservation program and design review guidelines.

(ji) For properties fronting on University Avenue between Marion and Emerald Streets a minimum four (4) foot front yard setback is required. The four (4) foot setback ~~shall~~must be either landscaped or paved. If paved (preferred), the property owner may provide a permanent easement to the City to provide additional sidewalk space. An additional six (6) feet may be added to provide an outdoor activity zone, pedestrian seating or amenities, resulting in a building setback of ten (10) feet. For local heritage preservation sites, the standard may be modified to comply with the preservation program and design review guidelines.

(kj) No side or rear yards are required along the interior lot lines except as otherwise specified in the building code; provided, that if walls of structures facing such interior lot lines contain windows or other openings, yards of not less than six (6) feet ~~shall~~must be provided. Side and rear yards of at least six (6) feet ~~shall be~~are required when a nonresidential use adjoins a side yard of a residential property. These setback requirements from interior lot lines shall be waived when an easement agreement is recorded as to the affected properties. Proof of such recorded easement shall be provided at the time of application for a building permit. The recording of the easement agreement shall be interpreted to mean that the following intents and purposes of these setback requirements are met: adequate supply of light and air to adjacent property; sufficient space for maintenance of the building from the same lot; and prevention of damage to adjoining property by fire or runoff from roofs. The setback ~~shall~~must be a minimum of thirteen (13) feet from the centerline of an adjoining alley.

~~(l) For the T3M Upper Landing area bounded by Chestnut Street, Spring Street, Smith Avenue and the Mississippi River, a maximum height of sixty-five (65) feet may be permitted without a conditional use permit, and a maximum height of one hundred (100) feet may be permitted with a conditional use permit, provided that such developments, to the extent reasonably possible, follow the design guidelines of the~~

~~"Sustainable Decisions Guide for City Facilities" or other sustainable development guidelines. For the T3M Victoria Park area generally bounded by W. 7th Street, Otto Avenue, Shepard Road and Montreal Way, a maximum height of seventy-five (75) feet may be permitted with a conditional use permit. For the T3M West Side Flats area generally bounded by Wabasha Street, Plato Boulevard, Robert Street, and the Mississippi River, the maximum permitted building heights shall be as shown on Figure 5.4 of the West Side Flats Master Plan and Development Guidelines adopted by the city council on June 10, 2015; for the parcels on the northeast and northwest corners of Robert Street and Plato Boulevard, a maximum height of seventy-five (75) feet may be permitted without a conditional use permit, and a maximum height of ninety (90) feet may be permitted with a conditional use permit. A shadow study and/or view analysis shall accompany the conditional use permit application to help determine the impact of the additional height.~~

(Ord. No. 11-27, § 1, 4-20-11; Ord 14-12, § 2, 6-4-14; Ord 15-5, § 3, 2-5-15; Ord 15-20, § 2, 6-10-15; Ord. 21-27, § 1, 8-18-21; Ord 22-1, § 3, 1-19-22)

Division 4. 66.340. Required Conditions

Sec. 66.341. Required conditions in T1—T2 traditional neighborhood districts.

(a) *Placement of parking.* Surface parking ~~must not be located within thirty (30) feet of a corner and may~~must be located:

- (1) To the rear of the principal building or within the rear yard of the parcel~~;~~;
- (2) In an interior side yard if rear parking is impractical or insufficient, provided that surface parking areas and entrance drives occupy no more than fifty (50) percent of the total lot frontage~~;~~ and that ~~surface~~ parking areas in light rail station areas ~~shall~~ occupy no more than sixty (60) feet of the lot frontage~~;~~ or
- (3) On a separate lot, in compliance with section 63.303.

~~(4) If a variance of this parking placement requirement is necessary to allow parking in front of a building because of special needs and site constraints, there should~~must be a ~~good~~ pedestrian connection between the sidewalk and building entrance, and the area ~~should~~must be well landscaped.

(b) In the T1 district, all activities except for off-street parking and loading ~~shall~~must take place within completely enclosed buildings, with the exception of outdoor seating areas for coffee shops or similar uses.

~~(c) Storefronts or ground floors originally designed for commercial use shall not be converted to more than fifty (50) percent residential use without a conditional use permit.~~ In conversion from commercial to residential use, the elements of traditional storefront design, where present, ~~shall~~must be retained. These include door and window openings, display windows, intermediate cornice lines, sign bands, awnings, arcades, and primary entrances facing the public street.

(d) In mixed-use buildings, nonresidential uses ~~shall~~must be located on the first floor or lower floors of the building. Residential units in mixed-use buildings may be located on any floor, but not directly beneath a nonresidential use.

(C.F. No. 10-403, § 6, 6-16-10; Ord. No. 11-27, § 1, 4-20-11; Ord 14-12, § 3, 6-4-14; Ord. 21-27, § 1, 8-18-21)

Sec. 66.342. Parking requirements in T3—T4 traditional neighborhood districts.

(a) *Placement of parking.* Surface parking ~~must not be located within thirty (30) feet of a corner and may~~must be located:

- (1) To the rear of the principal building or within the rear yard area of the parcel~~;~~;

- (2) In an interior side yard if rear parking is impractical or insufficient, ~~provided that~~ surface parking areas and entrance drives accessory to a principal building or use ~~may~~ occupy no more than sixty (60) feet of the total lot frontage: ~~or~~
- (3) On a separate lot, in compliance with section 63.30~~34~~, provided that surface parking is not permitted as the principal use of a lot unless it is shared among multiple businesses or uses.

(4) If a variance of this parking placement requirement is necessary to allow parking in front of a building because of special needs and site constraints, there ~~should~~must be a ~~good~~ pedestrian connection between the sidewalk and building entrance, and the area ~~should~~must be well landscaped.

(C.F. No. 10-403, § 6, 6-16-10; Ord. No. 11-27, § 1, 4-20-11; Ord. 21-27, § 1, 8-18-21)

Sec. 66.343. Traditional neighborhood district design standards.

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

~~Table 66.343. Applicability of Traditional Neighborhood District Design Standards~~

Guidelines	T1	T2	T3	T4
1. Land use diversity			✓	✓
2. Transitions to lower density neighborhoods		✓	✓	✓
3. Block length		✓	✓	✓
4. Compatible rehabilitation and reuse	✓	✓	✓	✓
5. Use established building facade line	✓	✓	✓	
6. Buildings anchor the corner	✓	✓	✓	✓
7. Front yard landscaping	✓	✓	✓	✓
8. Building facade continuity		✓	✓	✓
9. Building facade articulation—base, middle and top	✓	✓	✓	✓
10. Building height—treatment of 1-story buildings	✓	✓	✓	✓
11. Definition of residential entries	✓	✓	✓	✓
12. Entrance location	✓	✓	✓	✓
13. Door and window openings—minimum and character	✓	✓	✓	✓
14. Materials and detailing	✓	✓	✓	✓
15. Screening of equipment and service areas		✓	✓	✓
16. Interconnected street and alley network		✓	✓	✓
17. On-street parking		✓	✓	✓
18. Parking location and entrance design	✓	✓	✓	✓
19. Residential garage location	✓	✓	✓	✓
20. Parking lot lighting		✓	✓	✓
21. Entrance location for transit access	✓	✓	✓	✓

22. Street trees	✓	✓	✓	✓
23. Sidewalks	✓	✓	✓	✓

(b) *Traditional neighborhood district design standards.*

~~(1) Land use diversity. In general, it is desirable for each block to include some diversity in housing type, building type, and mix of land uses. In T3M districts any two (2) abutting block faces shall include more than one (1) land use or building type.~~

~~(2) Transitions to lower density neighborhoods. Transitions in density or intensity shall be managed through careful attention to building height, scale, massing and solar exposure.~~

~~(3) Block length. Block faces in mixed use areas shall typically not exceed four hundred (400) feet. Block faces in residential areas shall typically follow the pattern of neighboring blocks, but shall not exceed six hundred sixty (660) feet, the length of the standard Saint Paul block. This standard may be modified to ensure compliance with the city's adopted comprehensive plan and development or project plans for sub-areas of the city.~~

~~(4) Compatible rehabilitation and reuse. Remodeling, additions or other alterations to existing traditional buildings shall must be done in a manner that is compatible with the original scale, massing, detailing, glazing and materials of the original building. Original materials shall must be retained and preserved to the extent possible. Traditional buildings are typically sited close to the property line along the street and feature architectural and design elements that relate to the human scale.~~

~~(5) Use established building facade lines. New buildings shall relate to the established building facade line on the block where they are located. On most nonresidential or mixed use blocks, this is the inside edge of the sidewalk. For corner buildings, each facade that fronts a public street shall maintain the established building facade line. Portions of the facade may be set back a greater distance to emphasize entries or create outdoor seating and gathering areas.~~

~~(6) Buildings anchor the corner. New buildings on corner lots shall be oriented to the corner and both public streets. On corner lots at light rail transit station platforms, no portion of a structure shall be permitted in the triangular area of the lot included within fifteen (15) feet of the corner along each lot line.~~

~~(7) Front yard landscaping. Front yard areas located between the principal building and the street shall must be landscaped, except on University Avenue where the first four (4) feet may be paved similar to the public sidewalk. Other hard surfaced front yard areas should include amenities such as benches, tables, and planters. The amenities must be placed in a manner that does not create blind corners or areas of concealment.~~

~~(8) Building facade continuity. New buildings along commercial and mixed-use streets shall must provide a continuous facade along the street. Where breaks occur, the street edge shall must be continued through the use of fencing, low walls, and/or landscaping and/or similar treatments. Civic and institutional uses are exempt.~~

~~(9) Building facade articulation Frontage elements. The bottom base twenty-five (25) thirty (30) feet of buildings sides facing abutting public streets shall must include elements that relate to the human scale at grade. These should Elements include doors, and windows, texture, projections, awnings, and canopies, ornament porches, stoops, etc.~~

~~(10) Building roofline design height treatment of 1-story buildings. New buildings of two (2) or more stories are encouraged. One-story buildings shall must be designed to convey an impression of greater height in relation to the street with design elements such as. This can be achieved through the use of pitched roofs with dormers or gables facing the street, a higher tall parapets, and/or the use of an intermediate cornice line to separate the ground floor and the~~

roof upper level. Buildings of two (2) or more stories must include a cornice, parapet, or roof overhang in the area between the top floor and highest point of the building.

~~(11) Definition of residential entries. Porches, steps, pent roofs, roof overhangs, hooded front doors or similar architectural elements shall be used to define all primary residential entrances.~~

~~(126) Entrance location. There shall must be a primary pedestrian building entrance on all arterial or collector streets. At a corner location where both streets are arterial or collector streets, this standard may be satisfied with a single entrance at the corner. In multi-tenant buildings, any ground floor nonresidential use with street frontage shall must have an entrance facing the street or outdoor pedestrian-oriented courtyard on a primary street frontage.~~

~~(137) Door and window openings—minimum and character.~~

a. For new commercial and civic buildings, windows and doors or openings shall must comprise at least fifty (50) percent of the length and at least thirty (30) percent of the area of the ground floor along arterial and collector street facades.

~~b. Windows shall be designed with punched and recessed openings, in order to create a strong rhythm of light and shadow.~~

~~c. Glass on windows and doors shall be clear or slightly tinted, and allow views into and out of the interior.~~

~~db. Window shape, size and patterns shall must emphasize the intended organization of the facade and the definition of the building.~~

~~(148) Building Materials and detailing.~~

~~a. Residential buildings of more than six (6) units and nonresidential or mixed-use buildings shall must be built with constructed of high-quality materials such as brick, stone, textured cast stone, tinted masonry units, concrete, fiber cement siding, glass or metal. The following materials are generally not acceptable allowed:~~

- ~~- Unadorned plain or painted concrete block;~~
- ~~- Tilt-up concrete panels Corrugated metal, unless used as a limited architectural element rather than for entire walls;~~
- ~~— Synthetic stucco products;~~
- ~~- Reflective glass; and~~
- ~~- Vinyl, fiberglass, asphalt or fiberboard siding.~~

~~b. All building facades visible from a public street or walkway shall employ materials and design features similar to those of the front facade.~~

~~(159) Screening of equipment and service areas. If an outdoor storage, service or loading area is visible from adjacent residential uses or a public street or walkway, it shall must be screened by a decorative fence, wall or screen of plant material at least six (6) feet in height. Fences and walls shall must be decorative and architecturally compatible with the primary structure.~~

~~(1610) Interconnected street and alley network. The existing street and alley network shall must be preserved and extended as part of any new development. If the street network has been interrupted, it shall be restored whenever possible. Cul-de-sac streets are discouraged; crescent-shaped or courtyard street arrangements may be used when street connections are impractical.~~

~~(17) On-street parking. Streets shall generally have parking on both sides to buffer pedestrians, calm traffic and supplement off-street parking unless the space is needed to accommodate traffic volume, emergency vehicles, transit or deliveries. Parking bump-ins are permitted in special~~

~~cases (such as adjacent to large development sites) in conjunction with a redevelopment project that has at least three hundred (300) feet of street frontage.~~

~~(118) Structured Parking location and entrance design.~~

- ~~a. Off-street parking shall be provided within a principal structure, underground, or to the rear of buildings to the greatest extent possible. Limited side yard parking may be appropriate. Entrance drives and garage doors for underground or structured parking may face the street, except adjacent to light rail transit platforms, but and shall must be designed for pedestrian convenience and safety.~~
 - ~~b. Surface parking shall not be located within thirty (30) feet of a corner. Buildings shall be located to emphasize and "anchor" the corner whenever possible. Vehicular entrances to structured parking must be from a side street, when available, to minimize vehicle-pedestrian conflicts, except where it is determined in the review of a site plan that side street access would create or aggravate an unsafe condition or is impractical, unreasonable, or harmful to public safety.~~
 - ~~c. Vehicular entrances to structured parking shall must be minimized to the extent feasible so ~~that~~ they do not dominate the street frontage ~~of the building~~. Possible design techniques include recessing the entry; extending portions of the structure over the entry; using screening and landscaping to soften the appearance of the entry; using the smallest curb cut and driveway possible; and subordinating the vehicular entrance to the pedestrian entrance in terms of size, prominence in the streetscape location, and design emphasis.~~
 - ~~d. New above-grade parking structures fronting on arterial and collector streets shall must be lined with active commercial/retail uses at street level with direct access to the sidewalk.~~
 - ~~e. Upper levels of new parking structures shall must be designed with exterior wall treatments, ~~detailing, fenestration and materials that~~ and screening to reduce the view of vehicles ~~and relate to existing adjacent buildings~~.~~
 - ~~f. Structured parking must be designed with level parking floors and adequate floor-to-ceiling clearance height to allow the space to be converted to finished floor area if parking is no longer needed in the future and such design is determined cost-effective.~~
- ~~(129) Residential One- or two-family garage location. Attached ~~residential~~ garages shall must be recessed at least ten (10) feet behind the front facade of the building. Detached ~~residential~~ garages shall must be located in the side or rear yard, recessed at least twenty-five (25) feet behind the front facade of the building. When an alley is present, garages shall must be located in the rear yard and accessed through the alley. Individual ~~residential~~ unit garage entrances shall must be off alleys or interior courtyards. On corner lots, access to parking may be from the side street.~~
- ~~(2013) Parking lot lighting. Pedestrian-scale lighting shall must be provided within parking ~~areas~~facilities. Light standards shall must be no more than twenty-five (25) feet in height in parking lots and sixteen (16) feet in height along interior sidewalks and walkways, and have a downcast glow.~~
- ~~(214) Entrance location for transit access. ~~New and existing retail, office and multifamily housing shall coordinate with the transit agency in locating bus stops and related improvements. A~~ primary B building entrances shall must be located to provide easy direct access to transit stations, including light rail, bus, steps bus rapid transit, and shelters streetcar.~~
- ~~(2215) Street trees. Street trees and other landscape improvements must be planted in compliance with in the street right-of-way, as prescribed by the city forester and section 69.600 of the subdivision regulations, ~~and other landscape improvements shall be provided along all streets at regular intervals to help define the street edge, buffer pedestrians from vehicles, and~~~~

~~provide shade.~~ Trees ~~shall~~**must** be located in a planting strip at least five (5) feet wide between the curb and sidewalk, or in a planter or planting structure of a design acceptable to the city.

~~(2316) Sidewalks. Streets shall be designed with sidewalks on both sides except where they abut a park or other open space. In T1-T3, Ssidewalk width shall~~**must** be at least five (5) feet; ~~in T4, sidewalk width must be at least~~ **and** six (6) feet, or more in areas of high pedestrian activity. The T4 district is defined as an area of high pedestrian activity. See the Street Design Manual for additional information.

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.344. - Traditional neighborhood district planning requirements.

(a) *Previous plans.* Any pre-existing city-approved plans, such as small area plans, station area plans, ~~precinct district~~ plans or master plans, prepared for the site or the surrounding area ~~shall~~**must** be incorporated as appropriate in preparing any development plan for a T3 or T4 traditional neighborhood district site. It is understood that these plans may occasionally be amended as conditions change. The intent of such plans ~~shall~~**must** be realized to the extent possible in any subsequent development plans. For a T3 or T4 development site that, together with adjoining T3 or T4 parcels of land held by the same owner, is fifteen (15) acres or more in area, prior to issuance of building permits for new buildings on the site, a conceptual site plan ~~shall~~**must** be provided showing how the land under single ownership will be developed in conformance with any pre-existing city-approved plans.

(b) *Master plan.* For a contiguous area of at least fifteen (15) acres in traditional neighborhood districts, a master plan may be provided for review and recommendation by the planning commission and approval by city council resolution. The master plan may be already in existence, or it may be prepared by city staff or by the applicant or developer. A traditional neighborhood area for which a master plan has been adopted by the city council ~~shall~~**must** be designated as a T1M, T2M, T3M, and/or T4M district. The master plan may include additional regulations or provide specified relief from zoning regulations if the plan as a whole results in improved implementation of the comprehensive plan and of the zoning code's intent. The master plan may include the following information.

(1) Location maps of suitable scale showing the boundaries and dimensions of the site within the context of the community and adjacent parcels, including:

a. Locations of any streets; railroads; significant natural, geographic or topographic features; and other major features within five hundred (500) feet of the site; and

b. Existing parks, open space, major institutions, and concentrations of commercial use within one-half mile of the site.

(2) A site inventory and analysis to identify site resources and constraints, including floodplain, wetlands, poorly drained soils, soils with bedrock near surface, utility easements, slopes greater than twelve (12) percent, and areas of possible soil contamination.

(3) Plan graphics, including but not limited to the following:

a. Topographic contours at five-foot intervals.

b. Layout of blocks.

c. Circulation system, indicating existing and proposed streets or rights-of-way, transit stops, bike routes, sidewalks and other walkways.

d. Street classification system, designating streets by function within the site.

e. Block-level analysis, ~~designating blocks or portions of blocks as "mixed residential," "mixed use," "edge," "transition," or other (see section 66.345 Traditional neighborhood district master plan elements)~~ **and** identifying primary building types **and land uses** on each block. Blocks may be designated for a range of traditional neighborhood elements

and building types. Undesignated blocks would allow the full range of uses and building types.

f. Open space plan, including areas to be set aside as public or private open space and their preliminary design treatment.

g. Preliminary landscape plan, indicating street trees and landscape treatment of streets and public spaces.

(4) Plan graphics may include examples of building elevations for each building type; an indication of building scale, height, massing, parking location and relationship to the street; visual analysis of impact on critical views and vistas; and examples of streetscape and other public improvements, including light fixtures, screening walls and fences, benches and other street furniture.

(5) A preliminary stormwater plan, identifying any wetlands or floodplain, and preliminary locations of structures and methods to be used in managing stormwater and surface water on the site. Integration of stormwater treatment into the landscape and site design is encouraged, as is the use of natural methods such as ponds, wetlands or swales.

(6) Phasing plan, where applicable, including the phasing of open space and street improvements.

(7) Utilities plan, indicating existing conditions and proposed changes, as appropriate.

(c) *Changes to master plan.* Once approved, a master plan may be ~~amended~~modified as follows:

(1) *Minor ~~amendment~~modification.* Minor ~~amendments~~modifications to an approved master plan may be requested by the property owner or developer. The planning administrator may approve minor ~~amendments~~modifications, including changes of less than ten (10) percent in land area designated in a specific category provided such changes are consistent with the intent of the master plan.

(2) *Major ~~amendment~~modification.* Major ~~amendments~~modifications to an approved master plan may be initiated by the city council, the planning commission, or any person having an ownership or leasehold interest (contingent included) in property that is the subject of the proposed ~~amendment~~modification. Major ~~amendments~~modifications include changes of ten (10) percent or more in land area designated in a specific category; creation of a new public street or removal of a public street segment; removal of a park or open space area; or addition or removal of an entire block. Major ~~amendments~~modifications ~~may be approved as an amendment~~ are approved by city council resolution following planning commission review, public hearing and recommendation.

(d) *Modification of traditional neighborhood design standards in master planned areas.* The planning administrator may approve modifications of the traditional neighborhood design standards in Sec. 66.343(b) for master planned areas, when the modification does not include any changes to locations of public infrastructure, such as public streets, parks, sewers, and utilities, or changes to land uses of the master plan approved by city council. The planning administrator must find that:

(1) The modification is consistent with the Comprehensive Plan.

(2) The modification is consistent with intended design character or necessary to achieve a specific design goal of the master plan approved by city council.

(3) The modification provides for additional design flexibility necessary due to unforeseen changes to market conditions.

(4) The modification is requested at least two years after the approval of the applicable master plan.

(5) The modification allows for adequate and safe ingress and egress.

Applications for modifications denied by the planning administrator may be filed for variance as provided in Sec. 61.600 or master plan amendments as provided in Sec. 66.344(c) above.

(Ord. No. 11-27, § 1, 4-20-11; Ord 15-5, § 3, 2-5-15; Ord 22-25, § 1, 6-1-22)

Editor's note(s)—Former § 66.345, renumbered and amended by Ord. No. 11-27, § 1, adopted April 20, 2011.

Sec. 66.345. Traditional neighborhood district master plan elements.

~~This section applies to T3M and T4M districts for which a master plan designates blocks or portions of blocks as "mixed residential," "mixed use," "open space," "edge," or "transition area." A T3M traditional neighborhood district of fifteen (15) or more acres in area should include, at a minimum, a mixed residential area and the specified minimum percentage of open space within one-quarter (¼) mile of a mixed-use neighborhood center. These elements may be found within the T3M district or adjacent to it; the intent is that they would be present within a reasonable walking distance. A mixed-use area and/or an edge/transition area may also be required, depending on the criteria listed below.~~

~~(a) *Mixed use area.* The mixed use area consists of service and retail commercial uses, workplaces, civic uses, housing, and public open space. It contains the broadest variety of land uses, and is intended to function as a center of activity for residents of the entire T3 district and, potentially, surrounding areas.~~

~~(1) All residential lots within a T3M or T4M traditional neighborhood district should be located within approximately one-half mile of an existing or proposed mixed use area. The mixed use areas may be existing adjacent mixed use areas such as neighborhood commercial nodes.~~

~~(2) A mixed use area shall be composed of at least two of the following land use categories, as categorized in table 66.321, principal uses in traditional neighborhood districts:~~

~~a. commercial uses, such as general retail, restaurants, offices, services and accommodations~~

~~b. residential uses, not including one-family or two-family dwellings~~

~~c. civic and institutional uses such as school, place of worship, community meeting facility, library, and transit station~~

~~(3) A new mixed use area shall also include centrally located public open space, in the form of a square, park or plaza.~~

~~(b) *Mixed residential area.* A mixed residential area consists of a variety of housing types and limited office and service uses. It may be located anywhere within the district and is intended to be linked to surrounding areas by interconnected streets, paths and open spaces.~~

~~(1) A minimum of fifty (50) percent of all dwelling units in a mixed residential area shall consist of multifamily units, units in mixed-use buildings, and/or attached single-family units such as townhouses and live-work units.~~

~~(2) If over fifty (50) units are proposed in a site plan or master plan, at least two housing types shall be included from the following categories:~~

~~a. One and two-family dwellings~~

~~b. Attached units such as townhouses and live-work units~~

~~c. other multifamily dwellings~~

~~(3) For infill development, the required mix of residential uses may be satisfied by existing adjacent residential uses within a two-block radius.~~

~~(4) Up to twenty (20) percent of total floor area may consist of office and limited service uses as part of live-work units or integrated into residential structures.~~

~~(5) All residential lots shall be located within one-half (1/2) mile of existing or planned public or common open space.~~

~~(c) Edge or transition area. An edge area may be required as a lower density transitional zone responding to adjacent uses. The required mix of housing types specified in the previous sections shall not apply in transition areas. Densities and uses will depend on adjacent conditions.~~

~~(d) Open space areas. For a T3M district of fifteen (15) or more acres in area, a minimum of twenty (20) percent of a district's gross acreage, exclusive of street or alley right-of-way, shall be defined in the master plan as open space, which may include undevelopable areas such as steep slopes and wetlands, and stormwater basins.~~

~~(1) A minimum of fifty (50) percent of the required open space shall be accessible to and usable by the public, such as a central square or plaza, neighborhood parks, greenways, trail corridors, or extensions of existing parks on the periphery (as specified in comprehensive or small area plans, or in the master plan process).~~

~~(2) Existing parks or open space adjacent to the area may satisfy the open space requirement; a fee-in-lieu-of-park dedication may be required for enhancements to such adjacent existing parks or open space.~~

~~(Ord. No. 11-27, § 1, 4-20-11)~~

~~Editor's note(s)—Former § 66.344, renumbered and amended by Ord. No. 11-27, § 1, adopted April 20, 2011.~~

ARTICLE I. - 60.100. GENERAL PROVISIONS AND EXCEPTIONS

Sec. 60.104. Construction of language.

The following rules of construction apply to the text of this code:

- (a) The particular shall control the general.
- (b) In case of any difference of meaning or implication between the text of this code and any caption or illustration, the text shall control. Illustrations in this zoning code are provided for purposes of describing, clarifying or providing examples; such illustrations are not to scale and do not replace, limit or expand the meaning of the text.
- (c) The words "shall" ~~and "must" are~~ mandatory, and the word "may" is permissive.
- (d) Words used in the present tense include the future; words used in the singular number include the plural, and the plural the singular, unless the context clearly indicates the contrary.
- (e) The phrase "used for" includes "arranged for," "designed for," "intended for," "maintained for," or "occupied for."
- (f) The word "person" includes an individual, a corporation, a partnership, an incorporated association or any other similar entity.
- (g) Unless the context clearly indicates the contrary, where a regulation involves two (2) or more items, conditions, provisions, or events connected by the conjunction "and," "or," "either...or," the conjunction shall be interpreted as follows:
 - (1) "And" indicates that all the connected items, conditions, provisions or events shall apply.
 - (2) "Or" indicates that the connected items, conditions, provisions or events may apply singly or in any combination.
 - (3) "Either...or" indicates that the connected items, conditions, provisions or events shall apply singly but not in combination.
- (h) "Abut" means having a common boundary or relationship at a common property line, street or alley.
- (i) "Adjacent" means located nearby, with or without contact.
- (j) "Adjoin" means having a common boundary or relationship at a common property line.
- (k) "Contiguous" means abutting.
- (l) A "—" shall mean "through" when used between zoning district abbreviations within a land use category, e.g., "RT1—RM2" residential districts shall mean RT1, RT2, RM1, and RM2 residential districts.

(Ord 15-32, § 1, 7-22-15)

ARTICLE I. - 63.100. GENERAL PROVISIONS AND PERFORMANCE STANDARDS

Sec. 63.106. Projections into yards.

- (a) Attached vestibules, enclosed entrances and greenhouses may project up to twenty (20) square feet into a required front or rear yard and are subject to lot coverage requirements.
- (b) Ramps for the handicapped may project into required yards and are not subject to lot coverage requirements.
- (c) Chimneys and fireplaces may project up to one (1) foot into a required yard and are subject to lot coverage requirements.

(d) Except as otherwise provided for in section 63.501(b), overhangs, decorative details and bay windows may project into a required yard sixteen (16) inches plus two (2) inches for each foot of width of the required side yard and are not subject to lot coverage requirements.

(e) Air conditioning condensers may be permitted in required side and rear yards and nonrequired front yards and are not subject to lot coverage requirements.

(f) Attached uncovered balconies located on the second story and above may project up to five (5) feet into a required yard along a street or an alley and not closer than two (2) feet from a property line. Attached uncovered balconies are not subject to lot coverage requirements.

(Ord 23-43, § 4, 10-18-23)

Sec. 63.110. Building design standards.

(a) A primary entrance of principal structures must:

(1) Be located within the front third of the structure unless a pedestrian-oriented courtyard is provided in that area that leads directly to a primary entrance;

(2) Be delineated with elements such as porches, roof overhangs, pent roofs, hooded front doors, recessed entries, landscaping, or similar design features that relate to the human scale; and

(3) Have a direct pedestrian connection to the sidewalk along the abutting street. The connection must not require pedestrians to cross drives or other vehicular movements unless the structure is for an industrial use or its closest wall is located more than three hundred (300) feet from the sidewalk.

(b) One-family, two-family, and multiple-family dwellings with up to six (6) units are also subject to the following standards:

(1) A primary entrance must either: ~~(1) face an improved abutting street; or (2) be located off of a front porch, foyer, courtyard, or similar architectural feature, and set back at least eight (8) feet from the side lot line.~~

(2) Remodeling, additions or other alterations to the front façade of existing buildings must be done in a manner that is compatible with the original scale, massing, detailing and materials of the original building.

(3) Front yard areas located between the principal building and the street must be landscaped.

(c) For principal buildings, ~~except industrial, production, processing, storage, public service and utility buildings,~~ above grade window and door openings must comprise at least fifteen (15) percent of the total area of exterior walls facing a public street or sidewalk. In addition, for new principal residential buildings, above grade window and door openings must comprise at least ten (10) percent of the total area of all exterior walls. For principal residential building additions of more than one hundred twenty (120) square feet in floor area, above grade window and door openings must comprise at least ten (10) percent of the wall area, or above grade window and door openings must comprise at least ten (10) percent of the total area of all exterior walls of the building. Windows in garage doors ~~must~~ count as openings; ~~otherwise,~~ the area of garage doors ~~themselves do~~ not count as openings. For residential buildings, windows must be clear or translucent. For nonresidential buildings, windows ~~may~~ must be clear, translucent, or tinted and allow views into and out of the building interior on the first floor ~~opaque.~~ Industrial, production, processing, storage, public service, and utility buildings are exempt from these requirements.

~~(d) In pedestrian-oriented commercial districts characterized by storefront commercial buildings built up to the public sidewalk, new principal structures must have a maximum setback of fifteen (15) feet from a commercial front lot line. Where at least fifty (50) percent of the frontage of any block or corner is built up with existing buildings within fifteen (15) feet of the public sidewalk, a primary entrance must face the primary abutting public street, and At intersections on corner lots, buildings must "hold the corner," that is, have street facades, frontages, and/or projections within fifteen (15) feet of the lot line along both streets to establish a relationship between the building and the public sidewalk., or the site plan must have~~

~~vertical structural elements that "hold the corner." A primary entrance must face a primary abutting public street.~~

(e) Building materials and architectural treatments used on sides of buildings facing an abutting public street ~~should~~must be similar to those used on principal facades.

(f) The visual impact of rooftop equipment must be reduced through such means as location, screening, or integration into the roof design. Screening must be of durable, permanent materials that are compatible with the primary building materials. Exterior mechanical equipment such as ductwork must not be located on primary building facades.

(g) For property with local heritage preservation site or district designation, compliance with applicable historic guidelines is sufficient to meet the requirements of this section.

(C.F. No. 09-1286, § 3, 12-23-09; Ord. No. 11-101, § 1, 10-26-11; Ord 15-33, § 2, 7-22-15; Ord 23-43, § 4, 10-18-23)

ARTICLE II. - 65.100. RESIDENTIAL USES

Sec. 65.130. Cluster development.

The arrangement of multiple one-family dwellings, two-family dwellings, and/or multiple-family dwellings of no more than four (4) units, sharing a common open space on a single zoning lot.

Standards and conditions:

(a) *Lot size.* The parcel must have a minimum size of nine thousand six hundred (9,600) square feet and a maximum size of a one-half (½) acre, but parcels of record prior to August 1, 2023, that are larger than one-half (½) acre are permitted. Individual lots within a cluster development may have less than the required lot area for provided such reductions are compensated for by an equivalent amount of property owned in common elsewhere in the cluster development. Lot area ~~shall~~does not include areas designated as public or private streets.

(b) *Zoning district standards.* ~~Buildings must conform to the dimensional standards for minimum lot area per unit, minimum lot width, height, and setbacks for the zoning district.~~ Required yards within a cluster development may be reduced or eliminated provided required yards are maintained along the periphery of the cluster development. ~~In the RL-H2 districts, the maximum number of principal units per lot does not apply to cluster developments.~~

(1) RL-H2 Lots. Buildings must conform to the dimensional standards for minimum lot area per unit, minimum lot width, height, and setbacks for the zoning district. ~~Required yards within a cluster development may be reduced or eliminated provided required yards are maintained along the periphery of the cluster development.~~ ~~In the RL-H2 districts, t~~he maximum number of principal units per lot does not apply to cluster developments.

(2) T Lots. Buildings must conform to the dimensional standards for minimum and maximum floor area ratio (FAR), minimum lot width, height, and setbacks for the zoning district.

(c) *Lot coverage.* In the RL residential district, the total lot coverage of all buildings must not exceed forty-five (45) percent of the zoning lot. In the H1 residential district, the total lot coverage of all buildings must not exceed fifty (50) percent of the zoning lot. In the H2 residential district, total lot coverage of all buildings must not exceed fifty-five (55) percent of the zoning lot.

(d) *Accessory buildings.* No more than one (1) accessory dwelling unit is permitted per one-family dwelling in the cluster development. The accessory dwelling unit must meet standards (b)—(e) in section 65.913. The accessory unit does not count towards the minimum lot size per unit standard. Accessory buildings must conform to the standards in section 63.501, except (e).

(e) *Principal buildings.* Principal buildings must meet the following standards:

(1) Each principal building must either have an entrance that abuts the common open space or must be directly connected to it by a pedestrian path.

(2) Principal buildings within twenty (20) feet of a street property line may have their entrances facing the street and can connect to the common open space by the sidewalk in public rights-of-way that connects to the pedestrian path.

(3) Principal buildings not facing the common open space or the street must have their main entrances facing a pedestrian path that is directly connected to the common open space.

(4) The building design standards in section 63.110.

(f) *Common open space.* The cluster development must have a common open space for use by all residents. Common open spaces must meet the following standards:

(1) The common open space must be a single, contiguous area.

(2) The common open space must contain a minimum of one hundred fifty (150) square feet per principal unit within the cluster development. Accessory dwelling units are not subject to this requirement.

(3) The common open space must be a minimum of fifteen (15) feet wide at its narrowest dimension.

(4) The common open space must contain landscaping, lawn area, community garden, paved courtyard area, recreational amenities, or a mix of any of these, and may also include stormwater management infrastructure. Impervious elements of the common open space must not exceed seventy-five (75) percent of the total common area. Driveways and parking areas do not count as common open space.

(g) *Pedestrian path.* An accessible, hard-surfaced pedestrian path that is a minimum of four (4) feet wide must be provided that connects an entrance of each dwelling to the following:

(1) The common open space;

(2) Parking areas, if applicable;

(3) Sidewalks in public rights-of-way abutting the site or rights-of-way if there are no sidewalks; and

(4) A community building, if applicable.

(h) *Community building.* A cluster development may include one community building, for the shared use of residents, that provides space for accessory uses such as a community meeting room, exercise room, day care, laundry facilities, noncommercial community kitchen, or eating area.

(i) *Off-street parking.* Off-street parking facilities for the cluster development must conform to the standards in section 63.300.

(j) Individual lots, buildings, street and parking areas must be designed and situated to minimize alteration of the natural features and topography.

(k) *Conditional use permit.* A minimum lot area per unit that is lower than that required by the zoning district may be permitted with a conditional use permit, subject to the following conditions:

(1) Applications must include site plans, including landscaping and elevations and other information the planning commission may request.

(2) The floor area of individual dwelling units must be limited to no more than six hundred (600) square feet.

(3) The development must not contain any accessory dwelling unit.

(Ord 23-43, § 6, 10-18-23)

ARTICLE V. - 65.400. COMMERCIAL USES

Sec. 65.412. General retail.

General retail sales include the retail sale of products to the general public, sometimes with provision of related services, and produce minimal off-site impacts. General retail sales include but are not limited to the following:

- (a) Antiques and collectibles store;
- (b) Art gallery;
- (c) Bakery;
- (d) Bicycle sales and repair;
- (e) Book store, music store;
- (f) Butcher shop;
- (g) Catering;
- (h) Clothing and accessories;
- (i) Deli;
- (j) Drugstore, pharmacy;
- (k) Electronics sales and repair;
- (l) Florist;
- (m) Food and related goods sales;
- (n) Jewelry store;
- (o) Hardware store;
- (p) Leather goods, craft and sales, not tanning;
- ~~(pq)~~ Liquor store;
- ~~(qr)~~ Lower-potency hemp edible retail;
- ~~(rs)~~ News stand, magazine sales;
- ~~(st)~~ Office supplies, stationery store;
- ~~(tu)~~ Pet store;
- ~~(uv)~~ Photographic equipment, film developing;
- ~~(v)~~ Stationery store;
- (w) Picture framing; and
- (x) Video store.

Standards and conditions in T1 traditional neighborhood districts:

Retail uses must be less than five thousand (5,000) square feet in floor area.

Standards and conditions in T2-T4 traditional neighborhood districts:

~~In traditional neighborhood districts, a~~ conditional use permit is required for new construction covering more than twenty thousand (20,000) square feet of land to ensure size and design compatibility with the particular location.

(Ord 18-1, § 1, 1-24-18; Ord 24-21, § 1, 9-18-24)

Sec. 65.515. Farmers market.

An outdoor market at a fixed location consisting principally of farmers and gardeners for the purpose of selling the products of their farm, garden, greenhouse, apiary, or forest directly to the public.

Standards and conditions:

- (a) In residential districts, a farmers market shall be located on a zoning lot at least one (1) acre in area.
- (b) Approval of a site plan showing the number and location of vendors at the site, with contact information for a designated market director responsible for coordinating the market vendors and activities, and for providing the zoning administrator with updated contact information if it changes.

Standards and conditions for farmers markets with more than five (5) vendors in residential, business, or industrial districts:

- (c) A conditional use permit is required.
- (d) The use shall be limited to no more than three (3) days per week.
- (e) Foods, manufactured goods, wares and merchandise may be sold if approved by the planning commission.

Standards and conditions for farmers markets with five (5) or fewer vendors:

- (f) Sales shall be limited to no more than two (2) days per week between the hours of 7:00 a.m. and 7:00 p.m.

(Ord 13-51, § 2, 11-13-13)

Sec. 65.613. Coffee shop, tea house.

An establishment engaged principally in the sale of coffee, tea, and other nonalcoholic beverages for consumption on the premises or for carryout, which may also include the sale of a limited number of food items as allowed under a limited food menu license.

Standards and conditions in the T1 traditional neighborhood and B1 business districts:

A conditional use permit is required for a coffee shop or tea house of more than ~~eight hundred (800)~~ fifteen hundred (1,500) square feet in ~~gross~~ floor area ~~or for an accessory cabaret~~. Drive through uses (primary and accessory) are prohibited.

Standards and conditions in T2—T4 traditional neighborhood districts:

See section 65.614, restaurant.

(Ord. No. 11-27, § 1, 4-20-11; Ord. No. 12-26, § 1, 5-23-12; Ord 18-1, § 1, 1-24-18)

Note(s)—Former § 65.612. See editor's note, § 65.111.

Sec. 65.614. Restaurant.

A public eating place which serves a substantial portion of its food for consumption at tables or counters located on the premises. This term ~~shall~~ includes a deli with seating for more than twelve (12) customers.

Standards and conditions:

- (a) In ~~T2—T3~~ traditional neighborhood districts, a conditional use permit is required for establishments of more than fifteen thousand (15,000) square feet in floor area to ensure size and design compatibility with the particular location.
- (b) Outdoor restaurants ~~shall beare~~ accessory to an indoor restaurant or a farmers market.

(Ord. No. 11-27, § 1, 4-20-11; Ord. No. 12-26, § 1, 5-23-12; Ord 15-5, § 2, 2-5-15; Ord 18-1, § 1, 1-24-18)

Sec. 65.780. Limited production and processing.

These uses produce minimal off-site impacts due to their limited nature and scale, are compatible with office, retail and service uses, and may include wholesale and off-premises sales. Limited production and processing includes, but is not limited to, the following:

- (1) Apparel and other finished products made from fabrics;
- (2) Blueprinting;
- (3) Computers and accessories, including circuit boards and software;
- (4) Electronic components, assemblies, and accessories;
- (5) Film, video and audio production;
- (6) Food and beverage products, except no live slaughter, grain milling, cereal, vegetable oil or vinegar processing;
- (7) Jewelry, watches and clocks;
- (8) Milk, ice cream, and confections;
- (9) Musical instruments;
- (10) Novelty items, pens, pencils, and buttons;
- (11) Precision dental, medical and optical goods;
- (12) Signs, including electric and neon signs and advertising displays;
- (13) Toys;
- (14) Wood crafting and carving; and
- (15) Wood furniture and upholstery.

Standards and conditions:

(a) In ~~T2—T3~~ traditional neighborhood districts, a conditional use permit is required for new construction covering more than fifteen thousand (15,000) square feet of land to ensure size and design compatibility with the particular location.

(b) All such uses are intended to be compatible with adjacent commercial and service uses. Odors, noise, vibration, glare and other potential side effects of manufacturing processes ~~shall~~must not be discernable beyond the property line.

(Ord. No. 11-27, § 1, 4-20-11; Ord 13-57, § 2, 12-4-13; Ord 15-5, § 2, 2-5-15)

Editor's note(s)—Former § 65.773. See editor's note, §§ 65.772, 65.773. Former § 65.780 was renumbered as § 65.787.

Sec. 65.782. Printing and publishing.

Standards and conditions:

In ~~T2—T3~~ traditional neighborhood districts and B2 business districts, a conditional use permit is required for new construction covering more than fifteen thousand (15,000) square feet of land to ensure size and design compatibility with the particular location.

(Ord. No. 11-27, § 1, 4-20-11; Ord 13-57, § 2, 12-4-13; Ord 15-5, § 2, 2-5-15)

Editor's note(s)—Former § 65.776. See editor's note, § 65.781.

Sec. 65.785 Storage facility, ~~rental~~ mixed-use.

Rental storage within a mixed-use building that does not exceed fifteen (15) percent of the floor area of the building and does not have rental storage units located on the first floor or at a skyway level.

~~Standards and conditions in B4—B5 business districts:~~

~~The facility shall be located within a mixed-use building, shall not exceed fifteen (15) percent of the gross floor area of the building, and shall not be located on the first floor (except for access) or skyway level.~~

(a) The storage facility’s primary entrance, loading areas, and freight elevators must not be located within the front third of the building, and may not be shared with other uses.

(b) The floor to ceiling height within the mixed-use storage facility must be a minimum of nine (9) feet.

(Ord 15-5, § 2, 2-5-15)

ARTICLE II. - 66.200. RESIDENTIAL DISTRICTS

Division 3. - 66.230. Residential District Density and Dimensional Standards

Sec. 66.231. Density and dimensional standards table.

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

Table 66.231. Residential District Dimensional Standards

Zoning District	Lot Area Minimum (per principal unit)	Lot Width Minimum	Maximum Number of Principal Units Per Lot (f)	Building Height Maximum	Yard Setbacks Minimum (feet)			Maximum lot coverage for all buildings
					Front	Side	Rear	
	(sq. feet) (f)	(feet)		(feet)				(percent of the lot) (f)
RL large lot (l)	9,000 (a)	60	2	35	30 (d)	10 (e)	10	40%
H1 residential (l)	1,500 (a)	30	4 (b)	35	10 (d)	5 (e)	10	45%
H2 residential (l)	1,000 (a)	25	5 (b)	39 (c)	10 (d)	5 (e)	10	50%

Zoning District	Floor Area Ratio (FAR)	Building Height Maximum	Yard Setbacks Minimum (feet)		
	Maximum (g)		(Feet)	Front	Side
RM1 multiple-family (l)	0.6 FAR with surface parking 1.0 FAR with structured parking	40 (h)	10 (d)	9 (e), (k)	9
RM2 multiple-family	1.5 FAR with surface parking 2.25 FAR with structured parking	50 (i), (k)	10 (d)	9 (e), (j)	9 (j)

RM3 multiple-family	1.5 FAR with surface parking 3.5 FAR with structured parking	no maximum	10 (d)	9 (e), (j)	9 (j)
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Notes to table 66.231, residential district dimensional standards:

(a) If a two-family or multiple-family dwelling is developed on parcels where only the land immediately beneath each dwelling unit constitutes an individually described lot and all other land required for yards, other open space, parking, and other necessary land as required by this Code constitutes "common" properties, jointly owned by the owners of the described lots beneath each dwelling unit, the minimum size lot per unit is applied to the entire parcel.

(b) Up to two (2) additional dwelling units for the H1 residential district or one (1) additional dwelling unit for the H2 residential district and an additional five (5) percent lot coverage are permitted on the zoning lot through any combination of the following methods. These additional units are not subject to the minimum lot size per unit standard.

(1) *Affordable rental units.* Two (2) additional dwelling units in H1 and one (1) additional dwelling unit in H2 is permitted if twenty (20) percent of the total number of principal units on the zoning lot are leased at a rate at or below the sixty (60) percent of the area median income (AMI) rent limits as defined by the Multifamily Tax Subsidy Program published by Minnesota Housing and are affordable to and occupied by households earning up to sixty (60) percent of the area median income for at least ten (10) years. Each affordable unit must have at least the same floor area as another principal dwelling unit on the zoning lot. Prior to issuance of a building permit for the new building (or building expansion or conversion), demonstration of the commitment to affordable housing in accordance with this footnote must be provided as a deed restriction or other contractual agreement with the city, or a city housing and redevelopment authority financing agreement or other similar financing agreement. Upon occupancy of the units, documentation of the households' income qualifications is required.

Number of total principal units on the zoning lot with a density bonus	Number of units required to be affordable at 60% of AMI on the zoning lot
2	1
3	1
4	1
5	2
6	2

(2) *Affordable owner-occupied units.* One (1) additional dwelling unit is permitted for each principal dwelling unit on the zoning lot that is sold at a price affordable to a household earning up to eighty (80) percent of the area median income as defined by the Metropolitan Council's Livable Communities Act Affordability limits for ownership housing. The affordable dwelling unit must have at least the same floor area as another principal dwelling unit on the zoning lot. Prior to issuance of a building permit, demonstration of the commitment to affordable housing in accordance with this footnote must be provided as documentation of the fair market sales price via an appraisal based on full plans and specifications. Upon sale of the affordable unit to the end buyer, documentation of the household's income qualifications is required, and may include but not be limited to base pay or variable pay, income from business or self-employment, income from financial assets, government transfer payments, and insurance or benefit payments.

(3) *Three-bedroom units.* One (1) additional dwelling unit is permitted for each principal dwelling unit on the zoning lot containing three (3) or more bedrooms.

(4) *Conversions of or additions to an existing residential structure.* One (1) additional dwelling unit is permitted if at least fifty (50) percent of the floor area of an existing principal residential structure on the zoning lot is retained.

(c) In the H2 district, the maximum height for buildings with flat or shed roofs is thirty-six (36) feet.

(d) Where at least fifty (50) percent of the front footage of any block is built up with principal buildings and at least one (1) of the front yard setbacks of the existing principal buildings with front yards that adjoin the front yard of the lot is greater than fifteen (15) feet in the H1-RM3 districts or less than thirty (30) feet in the RL district, the following standards apply:

(1) Where there are two (2) existing front yards that adjoin the front yard of the lot, the minimum front yard setback is the midpoint between the district standard setback requirement and the larger of the two (2) adjoining front yard setbacks in the H1-RM3 districts or the midpoint between the district standard setback requirement and the smaller of the two (2) adjoining front yard setbacks in the RL district.

(2) Where only one (1) existing front yard adjoins the front yard of the lot, the minimum front yard setback is the midpoint between the district standard setback requirement and the adjoining front yard setback.

The property owner is responsible for reporting the relevant adjoining front setbacks to the zoning administrator on a certificate of survey.

(e) Side yards are required only for dwelling units on the ends of townhouse structures. The side yard setback requirement from interior lot lines may be reduced or waived when an easement or common wall agreement, certified by the city building official for conformance with the state building code, is recorded on the deeds of the adjoining parcels.

In RM1 and RM2 districts, the minimum side yard setback for a one-family dwelling, two-family dwelling, and multiple-family dwellings of thirty-five (35) feet in height or less on lots of sixty (60) feet width or narrower is five (5) feet.

(f) See section 65.130(a) for additional lot size requirements for cluster developments.

The maximum number of principal units per lot does not apply to cluster developments.

See section 65.130(c) for maximum lot coverage for all buildings for cluster developments.

(g) Floor area ratio (FAR) is prorated upon the percentage of parking that is provided as structured parking. The FAR maximum may be increased by 0.5 if at least ten (10) percent of the dwelling units on the zoning lot are leased at a rate at or below the sixty (60) percent of the area median income (AMI) rent limits as defined by the Multifamily Tax Subsidy Program rent and income limits published by Minnesota Housing, and are affordable to households earning up to sixty (60) percent of the area median income for at least ten (10) years. ~~affordable at sixty (60) percent of the area median income for at least ten (10) years.~~

The FAR maximum may be increased by an additional 0.5 (total of 1.0 increase) if at least twenty (20) percent of the dwelling units on the zoning lot are leased at a rate at or below the sixty (60) percent of the area median income (AMI) rent limits as defined by the Multifamily Tax Subsidy Program rent and income limits published by Minnesota Housing, and are affordable to households earning up to sixty (60) percent of the area median income for at least ten (10) years. ~~affordable at sixty (60) percent of the area median income for at least ten (10) years.~~ Units required to be affordable must be occupied by households earning up to sixty (60) percent of the area median income. Prior to issuance of a building permit for the new building (or building expansion), demonstration of the commitment to affordable housing in accordance with this footnote must be provided as: a deed restriction or other contractual agreement with the city, or a city housing and redevelopment authority financing agreement or other similar financing agreement. Upon occupancy of the units, documentation of households' income qualifications is required.

(h) On lots more than sixty (60) feet wide and on corner lots, a maximum height of forty-five (45) feet may be permitted with a conditional use permit.

(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.

(j) For portions of a building over fifty (50) feet in height, the minimum side and rear yard setbacks are twenty-five (25) feet or nine (9) feet plus one-half the building height over fifty (50) feet, whichever is less.

(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.

(l) In the RL-RM1 districts, permitted and conditional principal uses other than residential uses must meet the dimensional standards for the RM2 district.

(Ord 13-36, § 2, 6-26-13; Ord 15-33, § 3, 7-22-15; Ord 20-28, § 1, 9-9-20; Ord 20-30, § 1, 9-23-20; Ord. 21-27, § 1, 8-18-21; Ord 22-1, § 3, 1-19-22; Ord 23-43, § 7, 10-18-23)

Division 4. - 66.240. Required Conditions

Sec. 66.241. Multiple-family design standards.

The design standards in section 66.343(b)(~~2~~), (~~3~~), (~~27~~), (~~49~~), (~~11~~), (~~814~~), (~~915~~), (~~1046~~), (~~19~~), (~~1320~~), (~~1424~~), (~~1522~~), and (~~1623~~) shall apply to multiple-family dwellings residential buildings of more than six (6) units, along with the provisions in section 66.343(a).

(Ord 20-28, § 1, 9-9-20; Ord 22-1, § 3, 1-19-22)

Editor's note(s)—Ord 22-1, § 3, adopted January 19, 2022, repealed § 66.241, which pertained to required conditions; number of main (principal) buildings and renumbered §§ 66.242 and 66.243 as §§ 66.241 and 66.242.

ARTICLE IV. - 66.400. BUSINESS DISTRICTS

Division 3. - 66.430. Business District Density and Dimensional Standards

Sec. 66.421. Business district use table.

Table 66.421 business district uses, lists all permitted and conditional uses in the OS—B5 business districts, and notes applicable development standards and conditions.

Table 66.421. Business District Uses

Use	OS	B1	BC	B2	B3	B4	B5	Definition (d) Standards (s)
Residential Uses								
<i>Dwellings</i>								
One-family dwelling			P					(d)
Two-family dwelling			P					(d)
Multiple-family dwelling	P		P			P	P	(d)
Housing for the elderly	P		P			P	P	(d)
<i>Mixed Commercial-Residential Uses</i>								
Home occupation	P	P	P	P	P	P	P	(d), (s)
Live-work unit			P					(d), (s)
Mixed residential and commercial use	P	P	P	P	P	P	P	(d), (s)

Congregate Living								
Adult care home	P	P	P	P	P	P	P	(d), (s)
Community residential facility, licensed correctional			C	C	C	C	C	(d), (s)
Dormitory			P/C			P	P	(d), (s)
Emergency housing facility	P	P	P/C	P/C	P/C	P/C	P/C	(d), (s)
Foster home	P	P	P	P	P	P	P	(d), (s)
Fraternity, sorority			P/C					(d), (s)
Overnight shelter						C	C	(d), (s)
Roominghouse			C			P	P	(d), (s)
Shelter for battered persons	P/C	P/C	P/C	P/C	P	P	P	(d), (s)
Sober house	P/C	P/C	P/C	P/C	P/C	P/C	P/C	(d), (s)
Supportive housing facility	P	P	P	P	P	P	P	(d), (s)
Civic and Institutional Uses								
Club, noncommercial				P	P	P	P	(d)
College, university, seminary, or similar institution of higher learning	P	P	P	P	P	P	P	(d), (s)
Community center	P	P	P	P	P	P	P	(d), (s)
Day care	P	P	P	P	P	P	P	(d), (s)
Homeless services facility		P/C	P/C	P/C	P	P	P	(d), (s)
Museum						P	P	
Public library	P	P	P	P	P	P	P	
Public and private park, playground	P	P	P	P	P	P	P	
Religious institution	P	P	P	P	P	P	P	(d)
School, primary & secondary	P	P	P	P	P	P	P	
Trade school, arts school, dance school, etc.	P	P	P	P	P	P	P	
Public Services and Utilities								
Antenna, cellular telephone	P/C	P/C	P/C	P/C	P/C	P/C	P/C	(d), (s)
Electric transformer or gas regulator substation		C	C	C	P	P	P	(s)
Municipal building or use	P	P	P	P	P	P	P	(s)
Public utility heating or cooling plant						P		
Solar energy generation facility, community	P/C	P/C	P/C	P/C	P/C	P/C	P/C	(d), (s)
Utility or public service building	C	P	P	P	P	P	P	(d), (s)
Commercial Uses								
Office, Retail, and Service Uses								
General office, studio	P	P	P	P	P	P	P	
General retail		P	P	P	P	P	P	(d)
Service business, general	P	P	P	P	P	P	P	(d)
Service business with showroom or workshop			P	P	P	P	P	(d)
Alternative financial establishment					C	P	P	(d), (s)
Animal day care					P	P	P	(d), (s)
Artist's studio	P	P	P	P	P	P	P	(d)
Business sales and services					P	P	P	(d)
Cannabis retail		P/C	P/C	P/C	P/C	P/C	P/C	(d), (s)
Drive-through sales and services, primary and accessory	C	C		C	P	P	P	(s)
Dry cleaning, commercial laundry		P	P	P	P	P	P	(s)
Farmers market	P/C	P/C	P/C	P/C	P/C	P/C	P/C	(d), (s)

Garden center, outdoor			C	C	P			(d), (s)
Greenhouse					C			(d), (s)
Hospital					P	P	P	(d)
Mortuary, funeral home					P	P	P	
Outdoor uses, commercial				P/C	P/C	P/C	P/C	(d), (s)
Outdoor uses, commercial sales of consumer fireworks					C			(d), (s)
Package delivery service					P	P	P	(d)
Pawn shop					C	P	P	(d), (s)
Small engine repair, automotive bench work					P	P	P	
Tattoo shop			P	P	P	P	P	
Tobacco products shop			P/C	P	P	P	P	(d), (s)
Veterinary clinic				P	P	P	P	(d), (s)
<i>Food and Beverages</i>								
Bar				P/C	P	P	P	(d), (s)
Brew on premises store				P	P	P	P	(d), (s)
Coffee kiosk				P	P	P	P	(d), (s)
Coffee shop, tea house		P/C		P	P	P	P	(d), (s)
Restaurant				P	P	P	P	(d)
Restaurant, fast-food				P/C	P/C	P	P	(d), (s)
<i>Commercial Recreation, Entertainment and Lodging</i>								
Bed and breakfast residence		P	P	P	P			(d), (s)
Bingo hall, auction hall				C	P	P	P	
Hotel					P	P	P	(d)
Motel					P	P	P	(d)
Short term rental dwelling unit	P/C	P/C	P/C	P/C	P/C	P/C	P/C	(d), (s)
Health/sports club				P	P	P	P	(d)
Indoor recreation				C	P	P	P	(d)
Outdoor sports/entertainment							P	
Reception hall/rental hall				P	P	P	P	
Steam room/bathhouse facility			P	P	P	P	P	(d)
Theater, assembly hall				P	P	P	P	
<i>Adult Entertainment</i>								
Adult use					C	C	C	(d), (s)
<i>Automobile Services</i>								
Auto convenience market				C	C		P	(d), (s)
Auto service station				C	C		P	(d), (s)
Auto specialty store				C	C		P	(d), (s)
Auto repair station					C		P	(d), (s)
Auto sales, indoor					P	P	P	
Auto sales and rental, outdoor					C			(d), (s)
Car wash, detailing					C			(s)
<i>Parking Facilities</i>								
Parking facility, commercial						P	P	(d), (s)
<i>Transportation</i>								
Bus or railroad passenger station					P	P	P	
Helistop					C	C	C	(d), (s)
Railroad right-of-way	C	C	C	C	C	P	P	(s)
<i>Limited Production, Processing and Storage</i>								

Agriculture	P/C	P/C	P/C	P/C	P/C	P/C	P/C	(d), (s)
Brewery, craft				P/C	P/C	P/C	P/C	(d), (s)
Distillery, craft				P/C	P	P	P	(d), (s)
Finishing shop					P		P	(d), (s)
Limited production and processing					P		P	(d), (s)
Mail-order house			P	P	P	P	P	
Plastic products							P	(d)
Printing and publishing				P/C	P	P	P	(s)
Recycling collection center					P			(d), (s)
Recycling drop-off station			P	P	P	P	P	(d), (s)
Storage facility, rental mixed-use						P	P	(d), (s)
Toiletries and cosmetic manufacturing							P	
Warehousing and storage							P	(s)
Wholesale establishment					P	P	P	(d), (s)
Winery, craft				P/C	P/C	P/C	P/C	(d), (s)
Accessory Uses								
Accessory use	P	P	P	P	P	P	P	(d), (s)
Dwelling unit, accessory			P					(d), (s)
Micro-unit dwellings accessory to a religious institution	P	P	P	P	P	P	P	(d), (s)

P - Permitted use C - Conditional use requiring a conditional use permit

Notes to table 66.421, principal uses in business districts:

- (d) Definition for the use in Chapter 65, Land Use Definitions and Development Standards.
- (s) Standards and conditions for the use in Chapter 65, Land Use Definitions and Development Standards.

(C.F. No. 05-441, § 4, 8-24-05; C.F. No. 07-633, § 2, 8-15-07; C.F. No. 07-1148, § 2, 1-9-08; C.F. No. 08-640, § 5, 7-9-08; Ord No. 10-33, § 2, 10-27-10; Ord No. 11-26, § 2, 3-23-11; Ord No. 11-27, § 1, 4-20-11; Ord No. 12-26, § 1, 5-23-12; Ord 13-51, § 6, 11-13-13; Ord 13-57, § 3, 12-4-13; Ord 15-5, § 3, 2-5-15; Ord 16-5, § 1, 4-13-16; Ord 17-1, § 4, 1-25-17; Ord 17-38, § 5, 10-25-17; Ord 19-10, § 1, 6-26-19; Ord 19-60, § 1(Att. A), 10-9-19; Ord 19-72, § 2, 1-8-20; Ord 22-3, § 1, 1-19-22; Ord 21-33, § 1, 11-10-21; Ord 23-43, § 7, 10-18-23; Ord 23-57, § 3, 12-13-23; Ord 24-21, § 1, 9-18-24)

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 in the east Grand Avenue area.

Sec. 67.602. Standards and regulations.

- (a) Design standards. The **T2 District** standards in sections 66.341(a) and 66.343 apply.
- (b) Building and frontage regulations.
 - (1) Stepbacks. All portions of a building above a height of forty (40) feet must be stepped back from the minimum front, side street, or rear setback lines a distance equal to the additional height up to ten (10) feet.

(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.

ARTICLE V. - GENERAL REQUIREMENTS AND DESIGN STANDARDS

Sec. 69.507. Blocks.

(a) *Block width.* Blocks ~~shall~~must have sufficient width to provide for two (2) tiers of lots of appropriate depths. Exceptions to this prescribed block width ~~shall~~may be permitted in blocks adjacent to major streets, railroads or topographic barriers.

(b) *Block length.* ~~The lengths, widths and shapes of blocks shall be as are appropriate for the locality and the type of development contemplated, but b~~Block lengths in residential areas shall must generally be between not exceed one thousand (1000) three hundred thirty (330) and six hundred sixty (40660) feet, depending on the surrounding development context. This may be modified by the city council to ensure compliance with the comprehensive plan and development or project plans for sub-areas of the city.

(c) *Crosswalks.* Pedestrianways or crosswalks, not less than eight (8) feet wide, may be required by the city council through the center of blocks ~~more than eight hundred (800) feet long~~ where deemed essential to provide circulation or access to schools, playgrounds, shopping centers, transportation or other community facilities.

(d) *Industrial blocks.* Blocks designed for industrial uses ~~shall~~must be of such length and width as may be determined suitable by the ~~planning commission~~city council for prospective use.

(C.F. No. 03-1028, § 1, 4-7-04)

ARTICLE VI. - IMPROVEMENTS

Sec. 69.600. Required improvements.

(a) *Generally.* In instances where the subdivider owns all the property being served by the following listed improvements, and he petitions the city to construct the same, the subdivider will be charged the full cost of the improvement notwithstanding limitations contained in the city's assessment policy. In the event other properties, not owned by the subdivider, are served by the improvements, and if the city is petitioned to construct the same, the apportionment of costs, if required, will be determined by the City of Saint Paul. Prior to approval of the final plat by the city council, the subdivider must either have installed and dedicated to the city, or guaranteed to install in a manner set forth in section 69.500 et seq., and which meets the standards of the director of public works, the following improvements on the site. Exceptions to these requirements are allowed in the RL residential district; the nature of these exceptions are noted below.

(b) *Water facilities.* Except in the RL residential district, public water service to be installed by the city. Such service must consist of adequate water facilities, including fire hydrants and laterals to the property line. In the RL residential district, where new private wells or central water systems are permitted and existing private systems are not required to connect to a public water main, public water service need not be provided.

(c) *Sewer facilities.* Except in the RL residential district, public sanitary sewer service to be installed by the city. Such service must consist of adequate sanitary sewer facilities, including installation of laterals to the

public right-of-way line. In the RL residential district, where new individual sewage treatment systems are permitted and existing systems are not required to connect to a public sewer system, public sewer facilities need not be provided.

(d) *Storm sewer.* Storm sewer facilities not connected with street construction, to be installed by the city. The subdivider may install or may petition the city to install those storm sewer facilities that are connected with street construction (i.e., catch basins, leads to storm sewers).

(e) *Streets.* Except in the RL residential district, paved public streets, including curb and gutter, for those streets proposed in an approved subdivision. The subdivider may install the improvements, or ~~he~~ may petition the city to install such improvements. In the RL residential district, new streets may be unpaved and existing unpaved streets ~~is~~are not ~~be~~ required to be paved.

(f) *Monuments.* Durable iron monuments ~~shall~~must be set at all angle and curve points on the outside boundary lines of the plat, at all block and lot corners, and at all intermediate points on the block and lot lines indicating changes of direction in the lines, prior to the final recording of the plat.

(1) A statement or note on the final plat ~~shall~~must identify the type, size of monument set and the license number of the responsible land surveyor. Monuments set should be of durable iron, no less than one-half inch in diameter and fourteen (14) inches in length.

(2) The plat ~~shall~~must identify the type and size of monuments found and also identify by whom set if known or marked by a license number.

(g) *Street trees.* Street trees having a trunk diameter of not less than two (2) inches measured two (2) feet above grade, ~~shall~~must be installed by the subdivider along all streets at intervals no greater than forty (40) feet and at least one (1) per lot, along with other landscape improvements, to help define the street edge, buffer pedestrians from vehicles, and provide shade. Existing trees which meet the standards of this section may be used to satisfy these requirements. ~~Only honey locust, hard maple, green ash, ginkgo or other long-lived shade tree approved by the city forester shall be planted. Only tree species approved by the city forester can be planted, and must be planted through a Forestry Tree Work Permit Application. Trees must meet the quality and condition standards set forth in American Standard for Nursery Stock (ANSI Z60.1-2014).~~

(h) *Street names and signs.* Street signs at all intersections within or abutting the subdivision to be installed by the city. Street names ~~shall~~be subject to the approval of the city council.

(i) *Street lights.* Street lights meeting city standards and specifications ~~shall~~must be installed by the subdivider at all interior street intersections within an approved subdivision. Such lights ~~shall~~must also be installed on all interior streets within the subdivision at points designated by the director of public works and ~~shall~~must be no more than two hundred (200) feet apart.

(j) *Topsoil sodding and seeding.* Redistribution of topsoil on the lot and boulevard, to be done by the subdivider. The subdivider ~~shall~~must seed or sod the disturbed boulevard areas.

(k) *Sidewalks.* Public sidewalks along both sides of collector and arterial streets and in such other locations required by the city council. The subdivider may install such improvements or petition the city to install such improvements.

(Ord. No. 17890, § 6, 11-21-91; C.F. No. 93-1718, § 118, 12-14-93; C.F. No. 03-1028, § 1, 4-7-04; Ord 23-43, § 8, 10-18-23)

city of saint paul
planning commission resolution

file number 22-18

date March 4, 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 Saint Paul Zoning Code calls for periodic review of said code to reflect current city policies and bring the code up to date; and

WHEREAS, the City of Saint Paul has established zoning regulations related to Traditional Neighborhood (T) Districts in Zoning Code Chapter 66; and

WHEREAS, the 2040 Comprehensive Plan’s implementation chapter calls for analyzing and considering revisions to the Zoning Code, including dimensional standards, and staff has identified a variety of general text amendments that should be researched and considered based on use of the T Districts since they were adopted in 2004; and

WHEREAS, drive through sales and services are conditionally permitted in the T2 District and in some business districts, and the use can affect walkability and livability and should be reviewed to ensure where the use is permitted reflects the intent of T Districts consistent with 2040 Comprehensive Plan goals and policies (e.g., 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); and

WHEREAS, affordable housing is a critical need in Saint Paul and the T Districts have the potential to include affordable housing incentives and/or requirements similar to the existing RM residential multifamily density bonus incentives consistent with 2040 Comprehensive Plan goals and policies (e.g., H-31: Support the development of new affordable housing units throughout the city; H-37: Encourage the development of affordable housing in areas well-served by transit and/or in proximity to employment centers);

NOW, THEREFORE, BE IT RESOLVED, under the provisions of Section 61.801(b) of the Legislative Code, that the Planning Commission initiates the Traditional Neighborhood (T) Districts Zoning Study to consider amendments to Zoning Code regulations pertaining to T Districts, drive through sales and services, and other connected regulations contained in the Zoning Code.

moved by Holst

seconded by Presley

in favor Unanimous

against _____

Attachment 3: 2040 Comprehensive Plan Policies

The 2040 Comprehensive Plan supports new affordable housing and compact, pedestrian-friendly, mixed-use development with flexibility to respond to changing conditions and opportunities. See below for key policies related to this zoning study.

- LU-1. Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity.
- LU-6. Foster equitable and sustainable economic growth by:
 - Facilitating business creation, attraction, retention and expansion;
 - Supporting family-sustaining jobs and enhancing workers' skills to excel at those jobs;
 - Growing Saint Paul's tax base in order to maintain and expand City services, amenities and infrastructure;
 - Supporting business, real estate and financial models that keep more money locally, such as locally-owned businesses, local-prioritized employment, employee-owned businesses and commercial land trusts;
- 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-24. Prioritize public and private investments in infrastructure that:...
 2. maintain and improve the public realm to encourage street-level pedestrian activity; ...
- LU-28. Support pedestrian-friendly streetscapes and visual interest through commercial building design.
- LU-30. Focus growth at Neighborhood Nodes using the following principles:
 - Increase density toward the center of the node and transition in scale to surrounding land uses;
 - Prioritize pedestrian-friendly urban design and infrastructure that emphasizes pedestrian safety;
- LU-35. Provide for multifamily housing along arterial and collector streets, and in employment centers to facilitate walking and leverage the use of public transportation.
- H-31. Support the development of new affordable housing units throughout the city.
- H-37. Encourage the development of affordable housing in areas well-served by transit and/or in proximity to employment centers.
- 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.
- T-21. Reduce vehicle miles traveled (VMT) by 40% by 2040 by improving transportation options beyond single-occupant vehicles.
- T-22. Shift mode share towards walking, biking, public transit, carpooling, ridesharing and carsharing in order to reduce the need for car ownership.

Attachment 4: Community Outreach Summary

During the initial outreach period in spring of 2022, planning staff sent a request to district councils, community organizations, and developers seeking ideas and input to guide the work on the zoning study. The request was also sent to subscribers of the early notification system (ENS) list. The requests were sent in April 2022 and ideas and input were requested by mid-May.

Staff received email responses from Districts 2, 10, 11, 12, 13, 14, and 15, a member of Sustain St. Paul, and Sustain St. Paul. The ideas and input received during the initial outreach are provided in the table below.

Source of Ideas and Input	Ideas and Input
District 2	T zoning will encourage investment and development not only at Hillcrest but also along the long suffering White Bear Avenue. Increasing the diversity of housing choices as well as the emphasis on pedestrian friendly development , will revive White Bear Avenue and the businesses that border it. Fully support adding more T zoning districts in the neighborhood especially along White Bear Avenue as part of the small area planning there (they understand the study will not rezone property).
District 10	Do not anticipate much feedback since there is very little T zoning in the neighborhood.
District 11	<p>What is the goal for these districts? "Traditional" and "neighborhood" and their descriptions imply that new development should fit into the scale and design of existing neighborhoods. Yet the T designations cover a broad range of neighborhood types, all the way from T1 with its very low density single-family neighborhoods to T4 zoning that can fit in on University. This is such a wide range that it might make sense to ditch the "traditional neighborhood" name and scope entirely and be clearer about what, where, and why. Since only T1 and T2 are really "traditional" neighborhood types; suggest the T3 and T4 be re-envisioned.</p> <p>The T designations reference urban villages, but these are localized and walkable. Highland Park has an urban village, for instance. But several locations where the T zoning designations are applied are really corridors, not villages, and they should be treated as such. Has the city considered area plans for these corridors? What about strategic use of form-based codes?</p> <p>How does the traditional neighborhood update dovetail with the housing types the city is considering? Does it still make sense to include single-family development by right? What about parking?</p> <p>Are the T1-4 designations responsive to economic trends that serve neighborhoods? What can we do to make T1-T4 designations attractive and economically viable for developers? Mixed-use development is great, but sometimes nostalgia for main street sizing wins over current market realities.</p>

	Check out Highland Park and see what made it through the pandemic and what didn't. Take a look at newer mixed-use development along University - which spaces have a tenant and which are still sitting empty?
District 12	Can staff attend a meeting to answer questions?
District 13	Questions about timeline for study and for providing comment.
District 14	Can staff attend a meeting to answer questions?
District 15	The T districts are beneficial to the city in developing defining features of city neighborhoods, like the village in Highland Park. We should consider increasing the maximum height allowances for T1 and T2 to match T3, to allow increased density in the neighborhoods to promote housing development, promote transit usage (e.g., more people in transit corridors makes it easier to argue for increased transit), and more energy-efficient building structures to alleviate climate change concerns.
Luke Hanson - Sustain St. Paul	<p>As I look through the Zoning Code's section on Traditional Neighborhood districts, I have found myself looking back at the Land Use Definitions under Chapter 65 and comparing them to the table of Principal Uses in the TN Districts (Chapter 66, Section 321). Through this process, I've noticed (and been bothered by) the fact that the definitions of "General Retail" and "Service Business" in chapter 65 list some of the other Principal Uses which are specified on the table at 66.321:</p> <ul style="list-style-type: none"> • The Chapter 65 definition of "General Retail" lists the following uses which also appear on the table at 66.321: Art gallery, catering, deli, food and related goods sales, liquor store/ • The Chapter 65 definition of "Service Business" lists the following uses which also appear on the table at 66.321: Bank/credit union, dry-cleaning/commercial laundry, Food shelf, Laundromat, Mail/Package delivery, medical/dental clinic or laboratory, post office, small appliance repair <p>Is it within the scope of your TN study to make changes to the Definitions under Chapter 65? (I suppose that since these definitions are referenced in other Zoning Code districts, such as the B zones and C zones, maybe this is beyond your scope.) If it is within your scope, I would suggest cleaning these up in some way.</p> <p>A second question / idea: I think the zoning districts B1, B2, BC, and B3 should be discontinued, and the places currently zoned in those categories could be rezoned to TN districts. Has the Planning Commission or your department ever considered this? If not, I would like to suggest this idea for future study, what would be the best way to do that?</p>
Sustain St. Paul	<p>Would like to see the vast majority of parcels along Saint Paul's arterial and collector streets rezoned as Traditional Neighborhood in the near future.</p> <p>1. Our primary recommendation is to eliminate or severely limit the auto-related uses which are currently permitted in Traditional Neighborhood districts.</p> <ul style="list-style-type: none"> • "Drive-through sales and services, primary and accessory" is currently allowed with a CUP in T2; it should be prohibited in all TN districts. • "Gas stations," "auto convenience markets," "auto body shops," and "auto service stations" should not be allowed in T1 or T2, and perhaps not T3.

	<ul style="list-style-type: none"> • Most “Fast food restaurants” in Minnesota are distinguished by their drive-through facilities. We have no problem with allowing fast food in certain TN districts, provided that they do not include drive-throughs. <p>2. Some of the listings on the Permitted Uses table such as “General Retail,” “Service Business,” and “Business Sales and Services” are vague, and possibly redundant. If it is within the scope of this study, such listings should be clarified or eliminated.</p> <ul style="list-style-type: none"> • The Chapter 65 definition of "General Retail" lists the following uses which also appear on the table at 66.321: Art gallery, catering, deli, food and related goods sales, liquor store • The Chapter 65 definition of "Service Business" lists the following uses which also appear on the table at 66.321: Bank/credit union, dry-cleaning/commercial laundry, Food shelf, Laundromat, Mail/Package delivery, medical/dental clinic or laboratory, post office, small appliance repair <p>3. Consider allowing more types of commercial uses in T1 and T2, requiring a Conditional Use Permit as necessary. Some uses you might consider are fraternal lodges, museums, catering, restaurants (carry-out, deli, outdoor), business sales and services, general retail, food and related goods sale.</p> <p>4. We suggest a few minor tweaks to the dimensional standards of TN districts:</p> <ul style="list-style-type: none"> • Increase the permitted height of mixed-use buildings in T1 and T2 to 40 feet (from 35 feet). This would facilitate slightly taller ground-level ceilings, which are desirable for restaurants and other commercial spaces. • Reduce the minimum front setback for one-family dwellings in T1 to 10 feet (the current requirement is at least 15 feet). • Strike the second part of Note (e), italicized here for emphasis: “Except in river corridor overlay district, height of structures may exceed the maximum if set back from side and rear setback lines a distance equal to additional height. <i>Structures shall be no more than twenty-five feet high alongside and rear property lines abutting RL-RT2 residential districts; structures may exceed this twenty-five foot height limit if stepped back from side and rear property lines a distance equal to the additional height.</i>” We believe these step-back requirements are unnecessary. <p>5. Consider requiring that the above-ground portions of enclosed parking structures be constructed in a manner that would enable their conversion to residential use in the future. For example, each level of parking would need to be adequate to become a residential space, and the floors would need to be level and not steeply sloped.</p> <p>6. Add requirements and/or incentives for including bicycle parking facilities in TN buildings, especially those that include structured car parking.</p> <p>7. We strongly support the inclusion of affordable housing incentives in TN districts. We trust that your study of market conditions will help to determine the best way to design such incentives: for example, bonuses for building height or Floor-Area Ratio, units-per-acre, etc.</p>
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The request for ideas and input was sent to all district councils *and* the following community organizations and developers.

<p>Midway Chamber of Commerce East Side Area Business Association Payne Arcade Business Association East Side Neighborhood Development Company Minnesota Black Chamber of Commerce Latino Chamber of Commerce Minnesota Minnesota Hmong Chamber of Commerce Minnesota American Indian Chamber of Commerce Asian Economic Development Association African Economic Development Solutions Hmong American Partnership Lao Family Community of Minnesota Somali Action Alliance of Minnesota White Bear Avenue Business Association Business Review Council Grand Avenue Business Association Metropolitan Consortium of Community Developers</p>	<p>Rice-Larpenteur Alliance Highland Business Association Sustain St. Paul The Alliance Twin Cities North East Neighborhood Development Corporation Midway Economic Community Exeter Group Wellington Alatus PAK Properties Reuter Walton Ryan Companies Sherman Associates</p>
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The following is a summary of the ideas and input received.

1. What is the goal for the districts? "Traditional" and "Neighborhood" and their descriptions imply that new development should fit into the scale and design of existing neighborhoods. Yet the T1-T4 continuum is such a wide range of neighborhood types and densities that it might make sense to ditch the "traditional neighborhood" name and scope entirely and be clearer about what the T districts are, where they are, and why. Since only T1 and T2 are really "traditional" neighborhood types, suggest the T3 and T4 districts be re-envisioned.
2. The T designations reference urban villages, but these are localized and walkable. Highland Park has an urban village, for instance. But several locations where the T zoning designations are applied are really corridors, not villages, and they should be treated as such. Has the city considered area plans for these corridors? What about strategic use of form-based codes?
3. How does the traditional neighborhood update dovetail with the housing types the city is considering? Does it still make sense to include single-family development by right? What about parking?
4. Are the T1-4 designations responsive to economic trends that serve neighborhoods? What can we do to make T1-T4 designations attractive and economically viable for developers? Mixed-use development is great, but sometimes nostalgia for main street sizing wins over current market realities. Check out Highland Park and see what made it through the pandemic and what didn't. Take a look at newer mixed-use development along University - which spaces have a tenant and which are still sitting empty?
5. Consider increasing the maximum height allowances for T1 and T2 to match T3, to allow increased density in the neighborhoods to promote housing development, promote transit usage, and more energy-efficient building structures. More people in transit corridors makes it easier to argue for increased transit and energy efficient buildings help to alleviate climate change concerns.
6. Eliminate or severely limit auto-related uses in T districts (prohibit drive-through sales and service, gas stations, auto convenience markets, auto body shops, auto service stations, fast food with drive-throughs).
7. Clean up the permitted use table to remove redundant references.
8. Consider allowing more types of commercial uses in T1 and T2, requiring conditional use permits as necessary.
9. Increase the permitted height of mixed-use buildings in T1 and T2 to 40 feet (from 35) to allow slightly taller ground level ceilings
10. Reduce the minimum front setback for one-family dwellings in T1 to 10 feet.
11. Remove step back requirements from Sec. 66.331(e), they are unnecessary.
12. Consider requiring above ground portions of parking structures be constructed in a manner that would enable their conversion to residential use in the future.
13. Add requirements and/or incentives for including bicycle parking facilities in Traditional Neighborhood buildings.
14. Support the inclusion of affordable housing incentives in TN districts.



To: Spencer Miller-Johnson
spencer.miller-johnson@stpaul.gov

Re: T District Zoning Study – Union Park District Council recommendations

Mr. Miller-Johnson,

Thank you for the opportunity to provide input regarding the City's proposed revisions to the T Districts zoning code. And thank you and your colleagues for your excellent support materials and presentations, and for your detailed response to our request for additional information.

We appreciate your team's willingness to think beyond the established norms in order to improve clarity, consistency, timeliness, and administrative burden. We enthusiastically embrace these goals, and offer the following comments to better achieve those goals.

Sincerely,

Sarah Dvorak
Union Park District Council President

Content:

- Background
- Major Concern – Traditional Neighborhood District Uses (Oppose the Addition of Storage Facility)
- Major Concern – Dimensional Standards Table (Clarity)
- Major Concern – Dimensional Standards Table (Height – Maximum)
- Major Concern – Solar Access Protection
- Major Concern – Dimensional Standards Table (Height – Minimum)
- Major Concern – Dimensional Standards Table (Calculating Lot Size)
- Major Concern – Assuring Visual Interest and Variety
- Moderate Concern – The Name (“Traditional Neighborhood”)
- Moderate Concern – Editing Errors
- Minor Concern – Intent (Description of the T Districts)
- Minor Concern – “Intensity” vs “Density”
- Minor Concern – “Courtyard Building” vs “Courtyard”

UPDC Vision for T District Zoning (Zoning At Neighborhood Nodes and Along Transit Corridors):

These are some of the structures that we consider to be optimal land use along transit corridors / structures that we used as a frame of reference for our recommendations for T District dimensional standards:

T2 (4 stories): The Finn Apartments (725 Cleveland Avenue South, Saint Paul)



Per Spencer Miller-Johnson, CNU-A, Senior City Planner:

Zoned T2, which means that currently the height limit would be 35 feet. If the building were to be set back further from the street, it could go higher.

The building constructed is 45 feet. The developer likely received an approved conditional use permit for height, which includes a public hearing and Planning Commission review/decision.

T3 (6 stories): The Pitch Apartments (427 Snelling Avenue North, Saint Paul)



Per Spencer Miller-Johnson, CNU-A, Senior City Planner:

Zoned T3, which means that currently the height limit would be 55 feet for a mixed-use building. If the building were to be set back further from the street, it could go higher.

The building constructed is 75 feet. I do see that it received an approved conditional use permit for height in 2019.

**MAJOR CONCERN – T DISTRICT USES (OPPOSE THE ADDITION OF STORAGE FACILITY)
Table 66.321**

We firmly oppose the development of new storage facilities in neighborhood nodes and along transit corridors – therefore, we firmly oppose the addition of storage facilities to the approved uses in T Districts.

MAJOR CONCERN – DIMENSIONAL STANDARDS TABLE (CLARITY)

(pages 4-8)

We enthusiastically support the goal to “streamline the T District design standards, making them easier to understand and administer.” However, we believe that the proposed design standards need considerably more streamlining. Our recommendations:

- Formula:
form envelope met (setbacks + height criteria) + solar access preserved = approval
- Clear criteria by right rather than through the conditional use permit process, so that determinations are predictable and timely (and relatively time efficient to process), rather than discretionary, inconsistent, and slow (and relatively time-consuming to process).
“Maximum” means maximum / Footnotes for clarification only, not for adjustments / bonuses
Corollary: Because bonuses in footnotes mean that “Maximum” doesn’t mean maximum, bonuses in footnotes would be eliminated.
[You could have one table for dimensional standards without a density bonus and another table for dimensional standards with a density bonus – see examples below.]
- Replace FAR with building height (minimum and maximum), number of stories, and yard setbacks. (You don’t want really want short wide buildings and you really don’t want tall narrow buildings.)¹

Rather than this:

Building Type by Zoning District	<u>Density</u> <u>Intensity</u>	Lot <u>Area</u> <u>Size</u> Min <u>imum</u> (per <u>principal</u> unit)	<u>Lot</u> <u>Width</u> <u>Min.</u>	Building Height (feet)		Yard Setbacks (feet)		
	Min.—Max.(a)	<u>Area</u> (sq. ft.)(a)	<u>Width</u> (feet)	Min.	Max.	Front Min.— Max.	Side Min.	Rear Min.

Consider this:

Traditional Neighborhood & Transit Corridor Dimensional Standards							
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max	Stories Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max		
T1							1-2
T2							2-4
T3							3-6
T4							4-?

Or these (both tables would be included in the zoning code):

Traditional Neighborhood & Transit Corridor Dimensional Standards WITHOUT Density Bonus							
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max	Stories Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max		
T1							1-2
T2							2-3
T3							3-5
T4							4-?

Traditional Neighborhood & Transit Corridor Dimensional Standards WITH Density Bonus							
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max	Stories Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max		
T1							1-2
T2							2-4
T3							3-6
T4							4-?

¹Though Floor Area Ratio (FAR) is beneficial in downtown districts, we object to its use in neighborhood nodes and transit corridors for the following reasons:

- o FAR is a barrier to discussion with most people. It often has to be explained, and often requires diagrams to explain it (with varying levels of success). And, despite best attempts to explain it, FAR often inhibits the sharing of insights. Rather than inviting conversation, FAR tends to intimidate.
- o FAR is a barrier to visualization for most people.
- o The flexibility that FAR offers is not the flexibility that we ought to offer in neighborhood nodes and along transit corridors. Structures in neighborhood nodes and along transit corridors should snug up close to the sidewalk. With FAR, a tall narrow building is interchangeable with a short wide building. However, in neighborhood nodes and along transit corridors, neither is optimal use of the lot.
- o FAR does not control solar access / shadowing.
 - On an east-west street, a 2 story C-shaped building that occupies ½ of the lot (FAR 1.0) casts the same shadow as a 2 story building that occupies 100% of the lot (FAR 2.0).
 - On a north-south street, a 3 story L-shaped building that occupies 1/3 of the lot (FAR 1.0) casts the same shadow as a 3 story building that occupies 100% of the lot (FAR 3.0).

FAR was designed to limit human occupancy [by limiting square footage] in order to limit pedestrian, private vehicle, and transit traffic impact. It is an important tool for congested downtowns, allowing developers flexibility without exacerbating congestion. However, St. Paul's downtown is zoned B4 and B5 (not T). In nodes and along transit corridors, a wide short building is not interchangeable with a narrow tall building – and neither are particularly desirable.

Note: Our views about FAR have been shaped in large part by the June 1958 American Society of Planning Officials article. We acknowledge that the article is old, but it is the most comprehensive discussion that we found, and appears to be the basis for the recent articles that we found.

<https://www.planning.org/pas/reports/report111.htm>

MAJOR CONCERN – DIMENSIONAL STANDARDS TABLE (HEIGHT - MAXIMUM)

(pages 4-8)

City's proposal (maximum):

- T1 35 feet + footnote:
 - eđ (may exceed the maximum if set back from side and rear setback lines a distance equal to additional height)
- T2 35-45 feet + footnote:
 - eđ (may exceed the maximum if set back from side and rear setback lines a distance equal to additional height)
- T3 55 feet + footnotes:
 - eđ (may exceed the maximum if set back from side and rear setback lines a distance equal to additional height),
 - gđ (maximum height of ninety (90) feet may be permitted with a conditional use permit. Structures **shall** be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.)
- T4 75 feet footnotes:
 - eđ (may exceed the maximum if set back from side and rear setback lines a distance equal to additional height),

hg) Additional height may be permitted with a conditional use permit. Structures shall be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.

(ed) Except in the river corridor overlay district, hHeight of structures may exceed the maximum if set back from side and rear setback lines a distance equal to additional height. Structures shall be no more than twenty-five (25) thirty (30) feet high along side and rear property lines abutting adjoining RL-H2RT2 residential districts at a common property line or alley; structures may exceed this twenty-five (25) thirty (30) foot height limit if stepped back from side and rear property lines a distance equal to the additional height. Additional building height is permitted when stated in an adopted T District master plan.

(fe) A maximum height of forty-five (45) feet may be permitted with a conditional use permit. In T1 -T3, the FAR maximum may be increased by 0.5 if at least ten (10) percent of new dwelling units are leased at a rate at or below the sixty (60) percent of the area median income (AMI) rent limits as defined by the Multifamily Tax Subsidy Program rent and income limits published by Minnesota Housing, and are affordable to households earning up to sixty (60) percent of the area median income for at least ten (10) years. The FAR maximum may be increased by an additional 0.5 (total of 1.0 increase) if at least twenty (20) percent of new dwelling units are leased at a rate at or below the sixty (60) percent of the area median income (AMI) rent limits as defined by the Multifamily Tax Subsidy Program rent and income limits published by Minnesota Housing, and are affordable to households earning up to sixty (60) percent of the area median income for at least ten (10) years. Each unit required to be affordable must be occupied by a household earning up to sixty (60) percent of the area median income. Prior to issuance of a building permit for the new building (or building expansion or conversion), demonstration of the commitment to affordable housing in accordance with this footnote must be provided as a deed restriction or other contractual agreement with the city, or a city housing and redevelopment authority financing agreement or other similar financing agreement. Upon occupancy of the units, documentation of the households' income qualifications is required.

(gf) Except in the river corridor overlay district and within light rail station areas between Lexington Parkway and Marion Street, aA maximum height of ninety (90) feet may be permitted with a conditional use permit. Structures shall be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height. Additional building height is permitted when stated in an adopted T District master plan.

(hg) Additional height may be permitted with a conditional use permit. Structures shall be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height. Additional building height is permitted when stated in an adopted T District master plan.

UPDC Proposal:

In this table, "Minimum"/"Min" means minimum (including all possible bonuses and adjustments), and "Maximum"/"Max" means maximum (including all possible bonuses and adjustments).

(Which is to say, minimum means that this is where the conversation ends rather than where it begins, and maximum means that this is where the conversation ends rather than where it begins.)

Traditional Neighborhood & Transit Corridor Dimensional Standards (for areas not regulated by a master plan)							
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max	Stories Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max		
T1						20-25	1-2
T2						25-50	2-4
T3						37.5-75	3-6
T4						50-?	4-?

Note #1: Each of the areas regulated by a master plan should have their own dimensional standards table.

Note #2: Based on their approach to dimensional standards tables, it is our guess that City Planners are cited frequently for speeding, because they believe that the posted speed limit is not the end of the conversation with the Highway Patrol but just the beginning.

MAJOR CONCERN – SOLAR ACCESS PROTECTION

Require shadow studies above 4 stories / 50 feet, with clear objective criteria for approval. (Currently, for T3 and T4 “A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.”)

- Develop specific criteria for minimum acceptable solar access, preferably based on:
- o the shadows that would be cast on December 21 (the longest shadows), and
 - o a minimum number of hours of sunlight for every section of the property
- [Note: On December 21 (the shortest day of the year), there are 8 hours and 46 minutes of daylight.]
[Perhaps a reasonable minimum would be 4 hours and 30 minutes of sunlight on December 21.]

MAJOR CONCERN – DIMENSIONAL STANDARDS TABLE (HEIGHT - MINIMUM)

(pages 4-8)

City’s proposal (minimum):

- T1 none
- T2 none

Note: On pages 10-11, the zoning code states:
(105) Building roofline design height - treatment of 1-story buildings. New buildings of two (2) or more stories are encouraged. One-story buildings shall must be designed to convey an impression of greater height in relation to the street with design elements such as. This can be achieved through the use of pitched roofs with dormers or gables facing the street, a higher tall parapets, and/or the use of an intermediate cornice line to separate the ground floor and the roof upper level.

T3 25 feet
 T4 25 feet

UPDC Proposal:

In this table, “Minimum”/“Min” means minimum (including all possible adjustments), and “Maximum”/“Max” means maximum (including all possible adjustments).

(Which is to say, minimum means that this is where the conversation ends rather than where it begins, and maximum means that this is where the conversation ends rather than where it begins.)

Traditional Neighborhood & Transit Corridor Dimensional Standards (for areas not regulated by a master plan)							
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max	Stories Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max		
T1						20-25	1-2
T2						25-50	2-4
T3						37.5-75	3-6
T4						50-?	4-?

Though we did not intend to overly simplify our recommendations regarding building height, after contemplating buildings that we consider to be optimal land us in neighborhood nodes and along transit corridors, we ended up with:

District	Stories (Minimum)	Stories (Maximum)
T1	1	2
T2	2	4
T3	3	6
T4	4	?

MAJOR CONCERN – DIMENSIONAL STANDARDS TABLE (CALCULATING LOT SIZE)

Section 66.331 Footnote (a)

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

The alley is not an area of any lot that could be developed – therefore, we oppose the use of any portion of the alley for the calculation of lot size, for any and all purposes.

MAJOR CONCERN (WITHOUT A PROPOSED SOLUTION) – ASSURING VISUAL INTEREST AND VARIETY

Recent experience with the H District construction has raised our awareness of the importance of visual interest and variety. We don’t have an answer for how to assure this, but we hope that City Planners and Planning Commission members will set aside time to consider incentives and requirements to maintain and improve our visual vitality.

MODERATE CONCERN – THE NAME (“TRADITIONAL NEIGHBORHOOD”)

Feedback submitted during the T District Zoning Study included the suggestion to “be clearer about what the T districts are, where they are, and why.” (T District Zoning Study page 4-5)
“be clearer about what the T districts are, where they are, and why.”

Examples of zoning district names that we believe clearly imply their primary use:

- R Residential
- RM Residential Multifamily
- B Business
- I Industrial

Examples of zoning district names that we believe do not clearly imply their primary use:

- T Traditional Neighborhood [mixed use along transit corridors]
- H Historic [residential]

The updated descriptions of the T districts state that they are designed primarily for use in neighborhood nodes and along transit corridors. We believe that the name “Traditional Neighborhood & Transit Corridor” or the name “Transit Corridor” align better with the primary use than the current name “Traditional Neighborhood”.

MODERATE CONCERN – NEW EDITING ERROR

(page 10 of 32)

(105) Building roofline design height - treatment of 1-story buildings. New buildings of two (2) or more stories are encouraged. One-story buildings shall must be designed to convey an impression of greater height in relation to the street with design elements such as. This can be achieved through the use of pitched roofs with dormers or gables facing the street, a higher tall parapets, and/or the use of an intermediate cornice line to separate the ground floor and the

Created: 2024-08-20 09:46:18 [EST] (Supp. No. 126)

Page 10 of 32

“such as” – such as what???

MODERATE CONCERN – OLD EDITING ERROR

(page 18 of 32)

Rather than this:

Sec. 63.110. Building required yard sixteen (16) inches plus two (2) inches for each foot of width of the required side yard and are not subject to lot coverage requirements.

(e) Air conditioning condensers may be permitted in required side and rear yards and nonrequired front yards and are not subject to lot coverage requirements.

(f) Attached uncovered balconies located on the second story and above may project up to five (5) feet into a required yard along **sign standards**.

Consider this:

Sec. 63.110. Building design standards.

Required yard sixteen (16) inches plus two (2) inches for each foot of width of the required side yard and are not subject to lot coverage requirements.

(e) Air conditioning condensers may be permitted in required side and rear yards and nonrequired front yards and are not subject to lot coverage requirements.

(f) Attached uncovered balconies located on the second story and above may project up to five (5) feet into a required yard along ~~design standards~~.

MINOR CONCERN – INTENT (DESCRIPTION OF THE T DISTRICTS)

(pages 1-2)

Division 1. 66.310. Intent

Please consider using a consistent format for each T zone description:

- “intended to”, followed by
- “requires”, followed by
- “encourages, but does not require”, followed by
- “designed primarily for”

Sec. 66.312. Intent, T1 low density transit corridor district.

The T1 traditional neighborhood district is intended to foster and support compact, pedestrian-oriented commercial, residential, civic, and institutional development of limited size that, in turn, supports and increases transit usage. It encourages, but does not require, a variety of uses and housing types, with attention to the amount and placement of parking and transitions to adjacent residential neighborhoods. The T1 traditional neighborhood district is designed primarily for corner commercial buildings in residential areas and to serve as a transitional use of land along major thoroughfares, and between commercial or industrial districts and residential districts or other less intensive land uses.

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.313. Intent, T2 medium density transit corridor district.

The T2 traditional neighborhood district is intended to foster and support compact, pedestrian-oriented commercial, residential, civic, and institutional development of medium density that, in turn, supports and increases transit usage. It encourages, but does not require, a variety of uses and housing types, with attention to the amount and placement of parking and transitions to adjacent residential neighborhoods. The T2 traditional neighborhood district is designed primarily for use in existing or potential neighborhood nodes and existing or planned transit corridors.

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.314. Intent, T3 medium density transit corridor district.

(a) (b) The T3 traditional neighborhood district is intended to foster and support compact, pedestrian-oriented commercial, residential, civic, and institutional development of medium density that, in turn, supports and increases transit usage. It encourages, but does not require, a variety of uses and housing types, with attention to the amount and placement of parking. The T3 traditional neighborhood district is designed primarily for use in neighborhood nodes. Neighborhood nodes are compact, mixed-use areas that provide shops, services, neighborhood-scale civic and institutional uses, recreational facilities and employment close to residences that serve a neighborhood’s daily needs, including access to food.

(Ord. No. 11-27, § 1, 4-20-11)

(c) (d) St. Paul, Minnesota, Code of Ordinances (Supp. No. 126)

Sec. 66.315. Intent, T4 high density transit corridor district.

The T4 traditional neighborhood district is intended to foster and support compact, pedestrian-oriented commercial, residential, civic, and institutional development of high density that, in turn, supports and increases transit usage. It encourages, but does not require, a variety of uses and housing types, with attention

to the amount and placement of parking. The T3 traditional neighborhood district is designed primarily for use near transit stops along fixed rail transit (including commuter rail, light rail and trolley) corridors, existing and neighborhood nodes.

MINOR CONCERN – “INTENSITY” VS “DENSITY”

The proposed update uses the term “density” 6 approximately 6 times, including (page 10 of 32):

(2) Transitions to lower-density neighborhoods. Transitions in density or intensity shall be managed through careful attention to building height, scale, massing and solar exposure.

[The proposed switch to “intensity” creates the apples to oranges switch of higher intensity to lower density.]

Your executive summary refers to a “density bonus”:

- **Incentives for Affordable Housing** (Section 66.331). The footnotes of the Density and Dimensional Standards Table are proposed to include a density bonus for affordable housing.

While we appreciate your willingness to challenge established norms in order to improve precision, we anticipate that the terms “intensity” and “density” will be used interchangeably, to the benefit of none, and the confusion of at least a few.

MINOR CONCERN – “COUTYARD BUILDING” VS “COURTYARD”

(page 7 of 32)

Rather than this:

Up to forty (40) percent of the building façade on any lot may exceed the maximum setback for courtyard buildings, cluster developments, or to create outdoor seating or gathering areas.

Consider this:

Up to forty (40) percent of the building façade on any lot may exceed the maximum setback for cluster developments, or to create an outdoor seating area, gathering area, or courtyard.



Abundant housing, low-carbon transportation, and sustainable land use

Sustain Saint Paul

PO Box 16164, Saint Paul, MN 55116

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Our Mission

Sustain Saint Paul champions abundant housing, low-carbon transportation, and sustainable land use in the City of Saint Paul through education, advocacy and political action, to ensure a more just and equitable city for all current and future residents.

Wednesday, July 2nd, 2025

Dear Planning Commissioners,

We represent Sustain Saint Paul, a volunteer-driven advocacy organization that champions abundant housing, low-carbon transportation, and sustainable land use in the City of Saint Paul. We appreciate the opportunity to submit feedback about the proposed amendments to the Traditional Neighborhood zoning districts, and the specific Questions for the Community that you have published.

In short, we enthusiastically support all of the proposed updates to the Traditional Neighborhood zoning districts, and we would urge you and the City Council to initiate a study by the City of Saint Paul's Planning Department that would propose a large-scale rezoning of property into the T Districts across the city.

Below are our responses to your specific Questions for the Community:

1. Do you support additional development flexibility in T Districts, such as increasing building height by 10 feet in T2 and T3 districts? Why or why not? Yes, absolutely. The Planning Department's memo explains that the current requirement of a Conditional Use Permit and Public Hearing to obtain permission for additional height has been a significant impediment to development; allowing an additional ten feet by right is sensible.

2. Do you support simplified, objective design standards for T Districts? Why or why not? Yes. We feel that the proposed updates to the design standards will make them far simpler for prospective developers to follow, without significantly diminishing the required quality of design.

3. Do you support amendments to allow more neighborhood-scaled land uses in T Districts? Why or why not? Yes! Allowing a wider variety of neighborhood-scaled land uses is a positive change; it will enable the gradual development of small, local businesses and reduce administrative burden. This is one area where we would like to see even greater flexibility. For example, we feel that it would be reasonable to allow small restaurants and bars in the T1 district, not only in T2-T4. We also encourage you to consider consolidating the T1 district into the T2 district, so that parcels currently zoned T1 would become part of the T2 district. The dimensional standards of the districts are mostly identical (T2 allows slightly higher intensity for certain commercial uses), and so the primary effect of this change would be to allow a few more non-residential uses in the lowest-intensity district.

4. Do you support an amendment creating a density bonus for affordable housing? Why or why not? Yes. The T districts should have the same (or nearly same)

incentives for affordability that have been incorporated into the residential-only H and RM zoning districts. We trust that the details of these incentives have been calibrated to correspond with the current financial realities of land prices and development costs in Saint Paul, and that they will be updated in the future if and when those factors change.

5. Do you support amendments to allow outdoor gathering areas in front of buildings? Why or why not? Yes. These proposed amendments are a thoughtful strategy to cultivate vibrant, active streetscapes.

Next-Steps

Once the City of Saint Paul has adopted updates to the T Districts, we urge you to initiate a new zoning study that would put these zoning districts into widespread use throughout the City. During the public engagement sessions in May, Planning staff noted that most property owners who apply for rezonings seek to rezone their properties into the T Districts. This is no surprise, given the flexibility of their dimensional requirements and permitted land uses. Saint Paul needs to pursue every opportunity to catalyze neighborhood-scale economic development to build its tax base and build community wealth: rezoning more land into the T Districts is one such opportunity, because it reduces the number of barriers for Saint Paulites to create small-scale businesses within their neighborhoods in response to local needs.

Here are some ideas for what could be included in the scope of such a zoning study:

- Consolidating the Business zoning districts (B1-B5, OS) and the Vehicular Parking district into the Traditional Neighborhood districts (much as the old Residential Single-Family districts were consolidated into the H districts through the 1-4 Unit Housing Study in 2023)
- Rezoning land along arterial streets into the T districts (not only at the Neighborhood Nodes designated in the 2040 Comprehensive Plan)
- Rezoning parcels that once housed commercial spaces (e.g. along former streetcar routes) which are currently zoned in the H districts into the T districts
- Amending the H districts to allow a small number of small-scale commercial land uses (e.g. corner stores, Accessory Commercial Units) under certain conditions

Thank you once again for the invitation to comment, and thank you for taking on this process to modernize the T districts.

Sincerely,

Sustain Saint Paul Board of Directors

Thursday, July 10, 2025

Saint Anthony Park Community Council

Response to Planning Commission Questions on the Traditional Neighborhood District Zoning Study

Thank you for considering the Saint Anthony Park Community Council's response to the Planning Commission's call for community input on questions relating to the potential changes to Traditional Neighborhood (T) Zoning Districts.

The Community Council and its Land Use Committee have reviewed the recommended changes and have the following feedback to the Planning Commission's questions.

Do you support additional development flexibility in T Districts, such as increasing building height by 10 feet in T2 and T3 districts? Why or why not?

Yes. An additional story of height will allow for higher intensity developments. In Saint Anthony Park, T2 and T3 Districts are located around our commercial areas including Como Ave and University Ave. These areas are well suited to higher intensity development, including increased building height. We also support the proposed change to intensity requirements from units per acre to floor area ratio. Floor area ratio requirements will facilitate creative mixed-use developments in our commercial nodes.

Do you support simplified, objective design standards for T Districts? Why or why not?

Objective design standards ensure developers understand what requirements will apply to their development proposals. Simplified and objective design standards will improve St. Paul's ability to attract developments in T Districts. This is a welcome change and still leaves the opportunity for District Councils to advocate for their own set of design standards.

We oppose extending application of the building facade continuity standard to T1. It currently doesn't apply in T1 and adding it would make T1 design

standards less simple. One of the largest uses of T1 in the city is along Como Avenue in St. Anthony Park (including the Luther Seminary campus, a Lutheran Social Service office building, a large vacant site at Como and Eustis soon to be developed by Health Partners for a new clinic, a church, and our lovely public library), where this design standard just doesn't make sense.

Do you support amendments to allow more neighborhood-scaled land uses in T Districts? Why or why not?

Absolutely. Local businesses enliven Saint Anthony Park and create destinations throughout the neighborhood. T1 Districts in Saint Anthony Park are located along Como Ave where neighborhood-scaled land uses like local restaurants and shops already exist. Saint Anthony Park already has many ‘general retail’ businesses located in T2 Districts that are across the street from or share a border with T1 Districts. It just makes sense to expand flexibility of these uses, especially when the expansion is literally across the road in some cases.

Do you support an amendment creating a density bonus for affordable housing? Why or why not?

Yes. Developments that allow people with different economic circumstances to live in Saint Anthony Park should be given density bonuses, just as they would in other residential districts. The upcoming redevelopment of the Luther Seminary campus into residential use would be an ideal project to utilize this proposed density bonus for affordable housing.

We support the proposed density bonus, but would encourage the Planning Commission to consider a stricter affordability requirement. Zillow estimates the average rent in St. Paul at \$1,449. Rents affordable to households earning 60% of the area median income (AMI) according to the Metropolitan Council are higher than St. Paul’s average rent.

<i>2025 Rental Housing</i>				
# Bedrooms	30% AMI	50% AMI	60% AMI	80% AMI
Efficiency	\$694	\$1,158	\$1,389	\$1,852
1 Bedroom	\$744	\$1,241	\$1,489	\$1,985
2 Bedrooms	\$894	\$1,490	\$1,788	\$2,384
3 Bedrooms	\$1,032	\$1,721	\$2,065	\$2,753
4 Bedroom	\$1,152	\$1,920	\$2,304	\$3,072

Developments seeking a density bonus should be providing units that are more affordable than St. Paul's average rent. We would advocate adjusting the amendment to require units affordable at the 50% or 30% AMI levels if developments seek the maximum floor area ratio increase.

Do you support amendments to allow outdoor gathering areas in front of buildings? Why or why not?

Yes. Neighborhood engagement at street level brings excitement and a sense of place. Saint Anthony Park has many businesses with outdoor gathering areas across the neighborhood and we encourage developers to include this type of street level activation in their proposals.

The proposed amendment to allow greater setback for just part of a building doesn't do enough to allow such spaces in front of buildings. Speedy Market at Como-Doswell and Milton Square at Como-Carter are examples of highly valued outdoor gathering areas along the entire frontage of the building; it works just fine. We don't see a need for a maximum setback requirement or examples of a problem it solves. Other T district standards prohibit parking in front of buildings. Property owners have a natural incentive to use their property efficiently and don't need to be forced to minimize front yard setbacks. Where there are greater setbacks, they tend to be used for landscaping and gathering areas that are desirable. It's good that civic and institutional buildings are exempt from maximum setback requirements (the public library at Como-Carter, St. Anthony Park Lutheran Church, and Luther Seminary are examples). But when use of the seminary changes and it is redeveloped, the maximum setback requirements may harm the valued public open space on the Como frontage of the seminary campus. Rather than complicated amendments to complicated unnecessary maximum front yard setback requirements, the maximum setback requirements should simply be eliminated.

Do you support providing design flexibility in master planned areas to achieve the vision adopted for the site? Why or why not?

Currently Saint Anthony Park does not have any districts with master plans. If a master planned area were created with robust community involvement and reflected the vision of the community, then we would support providing design flexibility in those areas.



July 9, 2025

Honorable Mayor Carter
Honorable Members of the Saint Paul City Council
390 City Hall
15 Kellogg Boulevard West
St. Paul, MN 55102

Honorable Mayor Carter, Honorable Members of the Saint Paul City Council, Staff,

The City of Saint Paul's Business Review Council respectfully submits this letter of support for proposed T-District amendment changes. The BRC recognizes the importance of added flexibility that the amendment changes will allow for business owners in Saint Paul especially additional neighborhood-scaled uses allowed, streamlined objective design standards, increased development flexibility at nodes and corridors and language changes that are both more accurate and allow for greater public understanding.

In particular, the BRC has identified the following changes that will remove unnecessarily burdensome requirements for both City administration and potential business owners:

- The consolidation of building types to a single category labeled "All other"
- FAR consolidation and replacement
- The increased maximum building height limits in both T2 and T3 areas.
- Removal of land use diversity design standard.
- Removal of transition to lower-density neighborhoods design standard.
- Removal of overly prescriptive standards of door and window openings.

The amendment changes identified and proposed in T-District neighborhoods align well with the charge of the BRC to reduce or simplify burdensome regulations, eliminate obsolete requirements and promote cooperation among various City enforcement agencies, businesses, and neighborhood groups. Thank you for your consideration of this letter.

Sincerely,

R Lynn Pingol, Chair
Business Review Council

1555 Branston Street
Saint Paul, MN 55108
14 July 2025

Kristine Grill, Chair
Saint Paul Planning Commission
1400 City Hall Annex
25 West Fourth Street
Saint Paul, MN 55102

RE: Comments on Traditional Neighborhood (T) District Zoning Study

Dear Commissioner Grill and Members of the Planning Commission:

Thanks for the opportunity to comment on the Traditional Neighborhood (T) district Zoning Study, including proposed amendments to T district standards and proposed amendments to other chapters of the Zoning Code related to T districts.

The updated and clarified T district intent language, simplified dimensional standards table, streamlined regulations, and amendments to provide additional development and design flexibility are all good amendments based on what has been learned and how T districts have been used since first adopted in 2004. More could be done to simplify and clarify T district code language, make it more objective, and provide additional development flexibility.

Maximum front yard setback requirements in section 66.331 unnecessarily complicate the code, unnecessarily limit development flexibility, and aren't right some situations. For the kind of pedestrian-oriented design desired in T districts, the key is not to allow parking in front of buildings; this is covered in sections 66.341 & 66.342. It's unnecessary to require smaller front yard setbacks because, where appropriate, developers will want to fully use the space. Patios, outdoor gathering areas, trees and green space along the entire front of buildings are generally seen as desirable. There is no good reason for overly prescriptive maximum front yard setback requirements to restrict such things. Dickerman Park is an example of providing even greater than normal space for such things in front of buildings; it provides welcome relief to hardscape along University Avenue that the community likes. The maximum setback requirements are so complicated it's necessary to say the minimum front setback can't exceed the maximum! Better than more complicated exceptions to allow outdoor gathering areas in front of buildings, simplify and streamline the regulations by deleting the maximum setback requirements.

In some places, "shall be" should be replaced with "is" rather than "must" as proposed in 66.331(a): the first line of 66.331(c/new b), the last sentence of 66.331(d/new c), and 66.344(b). "Must" seems correct in 66.614(b), better than "are" to make the point that outdoor restaurants can't be a stand-alone use.

In 66.342(a)(4), delete both parts of the parentheses.

The amendments to simplify the T district design standards, and to make them more objective, are generally good. Here are some additional suggestions to clarify the language.

In 66.343(b)(4/new 1), *Compatible rehabilitation and reuse*, simply delete the word *traditional*. It seems like a code word for something. What tradition? Who's tradition? It's so ambiguous it's sort of meaningless. Don't add the sentence about setback, which is covered elsewhere, doesn't define *traditional*, and is not the issue here. Don't add the phrase about human scale; it doesn't clarify what "traditional" buildings are. Don't add the word "visibility"; it's unclear and confusing in this context.

In 66.343(b)(8/new 3), *Building facade continuity*, start the first sentence with "In T2-T4, new buildings along" T1 was written and intended for broader use than the other T districts, including for locations and situations where requiring building facade continuity is not appropriate. Therefore, *Table 66.343, Applicability of Traditional Neighborhood Design District Standards* (now proposed to be deleted) does not apply the building facade continuity standard to the T1 district. T1 is a good district for civic, institutional and residential uses along commercial and mixed-use streets for which building facade continuity is not a good standard. T1 is a good district for corner commercial buildings along mixed use streets where requiring building facade continuity is not appropriate. With *Table 66.343, Applicability of Traditional Neighborhood Design District Standards* now proposed to be deleted, 66.343(b)(8/new 3), *Building facade continuity*, needs to be amended to be clear that it just applies in T2-T4, and does not apply in T1.

In 66.343(b)(14/new 8), *Building materials*, underline the new word "Building."

In 66.344(d), *Modification of traditional neighborhood design standards in master planned areas*, underline the (d), which is new. Remove the commas between "areas" & "when" and between "infrastructure" & "such" because they confuse and change the meaning of the sentence.

On page 17, move "ARTICLE I. 63.100. GENERAL PROVISIONS AND PERFORMANCE STANDARDS" to come before "Sec. 63.106. Projections into yards." "Sec. 60.104, Construction of language," does not fall under 63.100, but rather falls under "ARTICLE I. 60.100. GENERAL PROVISIONS AND EXCEPTIONS."

In 63.110(d), change the new language so that holding the corner just applies where existing buildings are within 15 feet of the public sidewalk as follows:

- (d) ~~In pedestrian-oriented commercial districts characterized by storefront commercial buildings built up to the public sidewalk, new principal structures must have a maximum setback of fifteen (15) feet from a commercial lot line. At intersections, Where at least fifty (50) percent of the frontage of a block or corner is built up with existing buildings within fifteen (15) feet of the public sidewalk, a primary entrance must face the street, and on corner lots buildings must "hold the corner," that is ...~~

This appears to be the intent and makes sense. Without this change, the "holding the corner" standard would apply to all corner lots in the city, which I assume is not the intent.

In 65.130(b), simply add "floor area ratio" to the first sentence as follows:

- (b) *Zoning district standards.* Buildings must conform to the dimensional standards for floor area ratio, minimum lot area per unit, minimum lot width, height, and ...

The proposed new subparagraphs (1) and (2) under 65.130(b) are redundant and should be deleted.

Rewrite the proposed changes to Sec. 65.785 as follows:

Sec. 65.785. Storage facility, ~~rental~~ mixed use.

Rental storage within a mixed-use building.

Standards and conditions in ~~B4 B5~~ business districts.

- (a) The facility ~~shall be located within a mixed-use building, shall~~ must not exceed fifteen (15) percent of the ~~gross~~ floor area of the building and ~~shall~~ must not be located on the first floor (except for access) or a skyway level.
- (b) The storage facility's primary entrance, loading area, and freight elevators must not be located within the front third of the building, and may not be shared with other uses.
- (c) The floor to ceiling height within the storage facility must be a minimum of nine (9) feet.

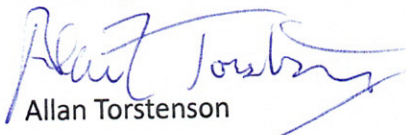
American Planning Association standards and conventions for zoning code definitions state that definitions should not include substantive regulatory provisions. The requirements that the use must not exceed fifteen (15) percent of the floor area of the building and not be located on the first floor belong in the standards and conditions for the use, not in the definition.

In Sec. 69.507(b), *Block length*, start the sentence as follows:

- (b) *Block length.* In residential, traditional neighborhood, and business districts, The lengths, widths, and shapes of blocks shall be as are appropriate for the ...

Requiring 330' – 660' block lengths doesn't make sense for industrial districts, and industrial block length requirements are covered in 69.507(d).

Sincerely,


Allan Torstenson

allan.torstenson@gmail.com

651-307-8393

Good evening Spencer,

Here is my comment. My name for the record is Benjamin Werner. If you need my address, it is 431 Classon Ave, Brooklyn, NY 11238.

"In regards to all proposed guiding questions my comment is the following. Any changes that allow for increased density, more walkability, more vibrancy, and less environmental impact are changes I support. Activating our commercial corridors through mixed use zoning is low hanging fruit in the fight for exciting, healthy cities where people can connect and where democracy thrives. I love the idea of promoting outdoor gathering spaces, density bonuses for affordable housing, and any other amendment that simplifies this process and encourages in-fill development on commercial corridors.

The only changes I would make are that I think the zoning districts could be expanded. The entire length of west 7th, all of Payne avenue, the full length of Dale, and Selby avenues should be included. Basically, if it can be a commercial corridor or already is, let's densify it and make it more livable, walkable and fun. Increasing our population through simplifying the T District Zoning will help increase our tax base and make our city more vibrant. If T4 allows the most dense use, I'd propose to change all districts to T4 as of right zoning. I support all amendments. Thank you."

Ben

Dear Mr. Miller,

I am a Saint Paul resident and condo owner at 350 St. Peter Street, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Sincerely,

Matt Frank

Dear Planning Commissioners,

I'm writing to express my enthusiastic support for the proposed updates to the Traditional Neighborhood zoning districts. I am particularly supportive of increasing the by-right height limits, to reduce the number of instances that development is delayed by CUP processes; and the expanded number of permitted land uses.

I also want to urge you to initiate another zoning study focused on broadly expanding the T Districts throughout Saint Paul. I suggest three concepts to be included within the scope of the study:

- Simplifying the Zoning Code by sunseting the Business districts and the Vehicular Parking district (perhaps consolidating them into the T Districts)
- Identifying formerly commercial buildings that are currently zoned in the H Districts and rezoning them into T Districts (to re-enable commercial uses in the future)
- Adding language to the H Districts that would enable small-scale commercial land uses within them (e.g. corner stores and Accessory Commercial Units) under certain conditions

Thanks for the invitation to comment, and thank you for your good work to modernize our Zoning Code.

Luke Hanson
1423 Eleanor Avenue

P.S. I forgot one additional idea to include within the scope of the study (perhaps the most straightforward one): rezoning land along arterial streets in Saint Paul into the T Districts.
Thanks.

Hello Planning Commissioners,

I am a Saint Paul resident at 238 Dale Street North, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

-Emmet Chappelle

Hello Planning Commissioners,

I am a Saint Paul resident at 890 Kenneth St. in Highland Park, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Sincerely,
Jenn

Hello Planning Commissioners,

I am a Saint Paul resident at 1458 Arona St Saint Paul, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards.

Thank you for your service to the City of Saint Paul.

Matthew Belanger

Hello Planning Commissioners,

I am a Saint Paul resident at 695 Fuller Ave., writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Thanks,

- Lincoln Wells

Hello Planning Commissioners,

I am a St .Paul resident from the West 7th neighborhood. After spending time in Europe this summer, marveling at their community-centered, walkable cities, I am happy to be writing to express my approval for the city studying changes that align T-Districts with the 2040 comprehensive plan.

I would also encourage the city to go a step beyond by studying a wider implementation of T-Districts to all current and future transit corridors. I am also in support of the city folding T1 districts into T2 districts, whose more expansive permitted uses and standards would help facilitate accessible community spaces that make for a more walkable, sustainable, and connected community.

Thank you for your service to the City of Saint Paul!

Best,

Barb Thees

232 Goodrich Ave, St Paul, MN 55102

Hello Planning Commissioners,

I am a Saint Paul resident at 2001 Selby Ave, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Best,

Henry Parker
2001 Selby Ave
St Paul, MN 55104

Hello Planning Commissioners,

I am a Saint Paul resident at 808 Berry St, Apt 407, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Noah Schneider

Hello Planning Commissioners,

I am a Saint Paul resident at 195 Cleveland Ave S, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors.

Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. I am especially in favor of any city planning that increases safety for pedestrians and cyclists, and encourages business growth and housing density along existing transit routes and nodes. Thank you for your service to the City of Saint Paul.

Sincerely,

Rachel Willson-Broyles

Dear Mr. Johnson,

I support the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability. I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts. I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts. Thank you in advance for your consideration. Chris Schirber

Hello Planning Commissioners,

I am a Saint Paul resident and small business owner. I live in Mac Groveland and have my business in the Creative Enterprise Zone. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. One reason we were able to get traction in forming the CEZ is because of the strength of the small commercial district on Raymond. It has contributed to a thriving mixed-use community. I would love to have more small businesses near my home (Cretin and St. Clair). We have longed for a coffee shop or bakery on our near corner.

I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.

2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

Thank you for your service to the City of Saint Paul.

Catherine Reid Day

Hello Planning Commissioners,

*I am a Saint Paul resident at **1383 Charles Ave, 55104**. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:*

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.

2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, especially along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

Thank you for your service to the City of Saint Paul.

Daniel Phillips

Hello,

I'm a homeowner in the Macalester-Groveland Neighborhood.

- I'm writing to convey my support for the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability.
- I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts.
- I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Thank you for your time and consideration.

Keren Ashie Whaley, MS, RN, FNP-C
2006 Lincoln Ave

Hello,

I'm a homeowner in the Macalester-Groveland Neighborhood.

- I'm writing to convey my support for the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability.
- I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts.
- I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Thank you for your time and consideration.

Daniel Whaley, PE - State of Texas
2006 Lincoln Ave

Dear Spencer,

I am writing as a homeowner in the Macalester-Groveland neighborhood to express my support for the proposal requiring density bonuses in T-zoned districts to be tied exclusively to affordability requirements.

I respectfully request that the Planning Commission and City Council extend these same density bonus requirements to RL1, H1, and H2 zoning districts.

Additionally, I request that the Student Housing Overlay District be updated to incorporate the new housing unit types permitted in these districts.

Thank you for your time and consideration.

Sincerely,

Kelly Wilen

Hi Spenser,

I strongly support the proposal that density bonuses in T-zoned districts be granted **only** when they are directly tied to true affordability. Our neighborhoods deserve housing that serves the people who live and work here, not just developers' bottom lines. I urge the Planning Commission and the City Council to apply these same common-sense rules to RL1, H1, and H2 zoning districts as well.

Also, I would like to ask that the Student Housing Overlay District be promptly updated to reflect the new types of housing units now allowed in those areas. This is an important opportunity to align our policies with the evolving needs of our community.

Let's ensure growth in our city is thoughtful, equitable, and genuinely affordable for all. Thank you.

Thanks,
Justin Grammens
2030 Dayton Ave
Saint Paul, MN 55104

Dear Spencer,

I support the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability. I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts. I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts. Thank you.

Margaret Frank

1977 Lincoln Ave, St Paul, MN 55105

Hello,

I'm a homeowner in the Merriam Park Neighborhood.

- I'm writing to convey my support for the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability.

- I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts.

- I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Thank you for your time and consideration,

Molly Tiedeman Brown

Hello,

As a homeowner in the Union Park neighborhood, I am writing to express my support for the proposal that density bonuses in T-zoned districts be granted only when tied to affordability.

I also request that the Planning Commission and City Council apply this same rule for density bonuses in the RL1, H1, and H2 zoning districts.

Additionally, I request that the Student Housing Overlay District be updated to include the new housing unit types now permitted in those districts.

Thank you for your time and consideration. Please let me know if you have any questions or additional information I may provide.

John Pyle

Good afternoon,

I am writing to voice my support for the changes to T zoning. I believe we should continue to improve density along transportation hubs and, if anything, don't think the expansions go far enough. Thank you for your work to ensure St. Paul can continue to be a growing city and one that hopefully can be affordable for more people to enjoy in the future.

Best,

Casey Ulrich
1723 Field Ave

I support the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability. I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts. I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Thank you.

Kathy Brudevold

2208 Sargent Ave

Spencer-

Thank you for returning my call. I will not be able to attend the Planning Commission meeting on July 11, 2025 at 8:30 am. I would like to give you what I would have said at the meeting.

This issue that I have with the T1,2,3,4 and the H1,2 zoning changes is that the developers have too much power over the residents in the neighborhoods where they want to make things "more " dense. I am opposed allowing a developer to tear down 2 single dwelling homes in order to build 4-6 story buildings. Would you want a 4 story, 24 unit next to your home? This is the kind of building St Paul does not need. Residents are not notified until after the fact. This is not how to treat your long-term residents.

It saddens me to watch my neighborhood change from single dwelling homes to four and 6 story apartment buildings, one right after another. These are not neighborhoods - these are asphalt jungles.

I hope the city can recognize that the long-term residents are being "kicked out" of their homes because of high taxes. The goal of more density is not the answer to the revenue question. Cutting your spending is the answer.

Thank you for allowing my response on these issues.

Sincerely,

KC Cox
Carroll Ave

Hi Spencer,

I live in Ward 4 and am writing to express my strong support for expanding T Districts. Doing so will help my neighborhood become more walkable, with more of our daily needs reachable on foot or by bike. Strict zoning separations between residential and commercial uses are an anachronism that are standing in the way of real progress in making St. Paul more livable and in pushing down our total vehicle miles traveled (by car, that is.)

Thank you—

Mark Thieroff

Hello Planning Commissioners,

I am a Saint Paul resident at 811 Como Ave Apt 8. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.
2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

I support the statement released by Sustain Saint Paul, attached.

Thank you for your service to the City of Saint Paul.

Jacob Hooper

Hello Planning Commissioners,

I am a Saint Paul resident at 337 7th St W. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.
2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

Thank you for your service to the City of Saint Paul.

Braden Holmes
Cabinetmaker
St. Paul, MN
5073639021
bradenholmes33@gmail.com

Hello Planning Commissioners,

*I am a Saint Paul resident at **958 Hatch Ave**. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:*

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards. As an artist who would like to be able to have a small retail store front on Front Ave and a small workspace this zoning would allow.

2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul. As an artist who would love to be able to have a small retail store on Front Ave and a small workspace this zoning would allow. Even if this was only applied to larger/higher volume streets so the neighborhoods were still all residential. These changes would drastically improve the opportunities for future business and community vibrancy!

Thank you for your service to the City of Saint Paul.

Carl Fristad

Hello Planning Commissioners,

I am a Saint Paul resident at 2183 Scheffer Ave. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.
2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

Thank you for your service to the City of Saint Paul.

Philip Breczinski

Hello Planning Commissioners,

I am a Saint Paul resident at **(1597 Chelsea St)**, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. I currently have one coffee shop in my neighborhood and it used to be a daycare. I would love to have multiple buildings that can be allocated so we can have both at one time. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Sigrid O

Hello Planning Commissioners,

I am writing to express my support for the recent zoning amendments proposed in the traditional neighborhood district (T-district) zoning study. I chose to reside in Saint Paul due to the walkability of my neighborhood, and I believe that every resident should be able to walk to a variety of small, local businesses.

Therefore, I would suggest that the Traditional Neighborhood zoning districts are applied in more locations across the City, including along current and future transit corridors and arterial streets.

Secondly upon review of the zoning study, I would recommend that the T1 district designation should be phased out in favor of the current T2 standards, which provide a higher degree of flexibility to entrepreneurs.

Thank you for your consideration.

John Scalise

924 Ighehart Ave, Saint Paul

Dear Planning Commission members,

I do a lot of walking in Saint Paul, especially in the Frogtown and Summit-University neighborhoods, and I am always intrigued by buildings, often on corners, that clearly once were small businesses - grocers, cafes, - that are no longer. I would love to see a return to more mixed uses in our residential neighborhoods. I've had the great fortune of traveling in Japan, where I see a very healthy mix of uses side by side - small rice paddies and vegetable gardens, homes, businesses, small shrines, schools - all in the suburb where my brother lives.

I am in favor of the city studying changes that align T-Districts with the 2040 comprehensive plan and studying a wider implementation of T-Districts to all current and future transit corridors. I think they would increase the vibrancy of our city and create more places where neighbors can get to know each other.

Thank you for considering these options.

Jeanne Landkamer
954 Aurora Ave.
St. Paul, MN 55104

Hello Planning Commissioners,

My wife Ofelia and I own IO Investments LLC, which owns a small Saint Paul commercial building at 1053 Dale St. N. This is where we operate [www.coffeeinlaw.com]Abogados Café, the first Latina-owned coffee shop in the Twin Cities.

I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.
2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

When Ofelia and I rezoned the building to T2 we got some help and guidance from city staff. However, the process was grueling and confusing. Language and standards from the 1900s made it all difficult to navigate. The process took about six months. For a business owner, that is way too long of a process.

I want a city where opening and operating a business is seamless and affordable. Currently, it is neither. As a business lawyer, I help business owners open shop all over Minnesota. Let me tell you a non-secret, the city of St. Paul is the toughest to enter and remain. My clients are not rushing to do business here. They only set up shop here if they must. Construction contractors automatically turn down projects when they hear "Saint Paul." It's not looking good.

St. Paul is dying. The census shows a decline in population. At this rate, our beloved capital city will be a ghost town in a few decades. The silverlining is that it could attract tourists to walk around the St. Paul of yore. But let's not get there.

This dying grandpa is on life support. Yet he's not that old--he's only been fed the wrong things, with minimal exercise, and poor sleep. Our city tends to follow very lofty and well-intended policies that are impractical and harmful. It appears our leaders care primarily about the good intentions of their policies, while ignoring their terrible results. There are a lot of egos within city

governance. Pet projects are prioritized over the wellbeing of the city as a whole. Leaders don't want to wake up and smell the coffee. Nevertheless, "I meant well" is not enough.

So here we are, with a dying city that can only be revitalized with common sense policies that foster business growth while taking the marginalized into account. This is not rocket science. Other cities have figured it out and are thriving.

Thank you for your service to the City of Saint Paul.

Sincerely,

Inti Martínez-Alemán
IO Investments LLC

1053 Dale St. N, Suite 202

Saint Paul, MN 55117

651-317-4895

ioinvestmentsmn@gmail.com

Hello Planning Commissioners,

I am a Saint Paul resident at (1800 Graham Ave, Saint Paul MN 55116), writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Courtney Peterson

Hello!

My name is Christopher Woxland, a born and raised St. Paulite currently living at 1515 Marshall Ave. I'm writing to voice my approval for future implementations of T districts throughout the city. Further I want to express my desire for the city to legalize accessory commercial units and corner stores in residential zoning districts. Both actions would allow the city to continue its mission to become a more sustainable and equitable city by providing walkable neighborhoods for all residents in the city. Not just those near transit lines or arterial streets.

Having grown up at 1999 Itasca Ave, I know first hand the disadvantages of living in a neighborhood surrounded with exclusively H1 zoning. This meant growing up to get to any coffee shops, grocers, restaurants, and other neighborhood gathering places. I (along with all my neighbors in this area) would have to walk at least a mile to either get to the Village or the W7th plaza. We are one of many neighborhoods in St. Paul where there is a dearth of walkable neighborhood shops.

This is why I had left St. Paul to go to college and stayed for a few years after as even predominantly residential neighborhoods would have coffee shops, bars, restaurants and other small businesses dotted throughout allowing one to be able to live in the neighborhood without a car. Thankfully when I decided to move back home I found a neighborhood that is off multiple transit lines and has allowed for not only T style development but other walkable infrastructure as well. Being able to allow coffee shops or other small neighborhood stores (like Talisman) on street corners throughout the city and not just in those areas will greatly improve the quality of life for the city's residents.

Thank you,
Christopher

I am a Saint Paul resident at 1768 Englewood Ave, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards.

Thank you for your service to the City of Saint Paul.

Bobby Wargo

I am a Saint Paul resident at 978 Barrett, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Matt Schneider

South Como Community Investment Cooperative

secretary@southcomocoop.org | southcomocoop.org

Dear Mr. Miller-Johnson,

I'm a homeowner in St. Paul's Shadow Falls neighborhood. I'm concerned about degradation of our neighborhood from the proliferation of closely-spaced, dormitory-style student housing structures, and the resulting increase in noise, litter, parking issues, vehicular and pedestrian traffic, and vehicle-pedestrian and vehicle-cyclist conflicts, and worsened visual appeal and sense of neighborhood cohesion.

- I'm writing to convey my support the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability.

- I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts.

- I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Respectfully,

James Johnson

jjohns007@icloud.com

2224 Dayton Ave, St. Paul, MN 55104

Hello Planning Commissioners,

I am a longtime Saint Paul resident at 935 Linwood Ave. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.

2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

It would be wonderful to have many more vibrant neighborhood shopping nodes available like we currently see in our sister city, Minneapolis.

Thank you for your consideration,

Kimberly Feilmeyer

Hello Planning Commissioners,

*I am a Saint Paul resident at **(1446 Cumberland St. St. Paul, MN 55117)**. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:*

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.

2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

We would love to find ways to support local entrepreneurs and small businesses in our neighborhoods. Thank you for your service to the City of Saint Paul.

Sincerely, Gina Brewington

906-360-6107

Hello -

I am reaching out to express my support for the proposal that density bonuses in T-zoned districts be given **ONLY** when tied to affordability. I also strongly urge the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts. Further, I request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

I live in Merriam Park and we do not need more student housing! The buildings being put up in my neighborhood currently are large, configured for students, and are definitely not affordable. They do not fulfill the desire by the city for affordable housing and neighborhood diversity. They do not help to maintain a good balance between full-time residents of Merriam Park and the student population. The Student Housing Overlap was enacted to maintain a balance between a livable neighborhood and a college campus. The current situation is not maintaining that balance and could drive down housing costs and cause people to move away.

Thank you.
Naomi Shapiro