



CITY OF SAINT PAUL  
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DATE: August 12, 2015  
TO: Planning Commission  
FROM: Neighborhood Planning Committee  
RE: Gold Line (Gateway) Station Area Plans, associated plan amendments, and zoning study

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### **PUBLIC HEARING TESTIMONY**

The Planning Commission held a public hearing regarding the Gold Line Station Area Plans, associated plan amendments, and zoning study on July 24, 2015. Representatives from St. Paul Youth Services and the Sun Ray shopping center ownership spoke and provided written comments, and one resident spoke. Also, the Heritage Preservation Commission (HPC) has provided comments via a resolution. A second public hearing occurred August 7, 2015 with the hearing held open for written comments until 4:30 p.m. on August 10, 2015 – no persons spoke at the August 7 hearing and no other written comments were received.

St. Paul Youth Services expressed concern regarding a proposed park & ride on their property and its impact on their continued viability and ability to provide services. They asked to be included in the Gold Line planning process for the Sun Ray station.

Stinson Leonard Street, representing the Sun Ray property owners, objects to the lack of accommodation for existing development and potential future incremental growth. Specifically, they object to the long-term street grid (illustrated by Figure 38 on page 54 of the draft plan) not relating to existing development, the short-term pedestrian/bike connection through the center, and rezoning to T4 that unrealistically hinders higher density development not in conformance with T4 regulations such as FAR minimums, maximum setbacks, emphasis on multi-story buildings, mandates on the configuration of parking facilities, window coverage, and required material on building façades.

A District 1 resident spoke to emphasize that the Sun Ray Design Workshop, held in February, was a thoughtful group process that considered shopping center impacts and worked to improve safety and pedestrian/bike connectivity issues in the area – it was not planned on a whim.

The HPC resolution calls for an assessment of historic resources to be conducted prior to BRT location decisions, for property impacts to all historic properties (not just locally designated ones) to be considered and avoided in choosing a BRT alignment, for buildings with historic

character to be preserved in all station areas, and for future recommendations and implementation to be consistent with the Historic Preservation chapters of the Comprehensive Plan and the Legislative Code.

### **ANALYSIS OF TESTIMONY**

The section below analyzes the main issues raised by public testimony:

1. Issue: The plan may impact the viability of the St. Paul Youth Services property located at the southeast corner of Pederson Street and Wilson Avenue, behind the Sun Ray shopping center.

Response: The main threat to St. Paul Youth Services' ability to provide services is the proposal to place and construct a park & ride facility on or near their property. The plan currently states the park & ride is preferred to be located "at the southeast corner of Pederson Street and Wilson Avenue, behind the Sun Ray shopping center." Given that the St. Paul Youth Services building is located approximately 225 feet east of the Pederson right-of-way, the site's proposed T3 zoning calls for minimal (0 to 10-foot) building setbacks along Pederson and Wilson, and the park & ride facility with an anticipated 350 spaces is unlikely to require a width of more than 200 feet, there does not appear to be a need to remove the building in order to place a park & ride in accordance with the recommendation. Any parking that is needed by St. Paul Youth Services and removed by the park & ride could be replaced within the new structure. The building, with its prominent windows along Wilson Avenue, furthers the transit-oriented development vision for the area. Also, the services provided are important to the community and should be maintained. The plan language regarding the recommended park & ride location should be amended to state that the park & ride should be placed and designed so as to not remove the St. Paul Youth Services building. Additionally, the plan language should be amended to support the park & ride "at or near the southeast corner of Pederson Street and Wilson Avenue..." to provide additional flexibility for avoiding removal of the building.

The actual decision regarding park & ride placement will be made by the Gateway (Gold Line) Corridor Commission in conjunction with the Federal Transit Administration. St. Paul Youth Services should become involved directly in that decisionmaking process. Accommodations for construction impacts to St. Paul Youth Services are already called for on page 17 of the draft plan: "The construction project should seek ways to mitigate negative impacts on residential and commercial properties."

2. Issue: The long-term Sun Ray street grid does not relate to existing development.

Response: The draft plan states: "As the Sun Ray shopping center redevelops, provide an urban street grid with pedestrian amenities and buildings placed near the sidewalks." The proposed T4 zoning includes a design standard that states: "Block faces in mixed use areas shall typically not exceed 400 feet. Block faces in residential areas shall typically follow the pattern of neighboring blocks, but shall not exceed 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." The long-term street grid illustration in Figure 28 on page 54 is conceptual and not prescriptive. Nothing in the draft plan precludes the implementation of the long-term street grid from relating to existing development. The long-term grid will be implemented as the private sector decides to redevelop portions of the shopping center. The plan document should be amended to include further clarification that redevelopment will occur only when the private sector chooses, and that, whether redevelopment is incremental or complete, the plan envisions introduction of an urban street grid.

3. Issue: The new north-south pedestrian/bike connection through the Sun Ray shopping center, to be implemented in the short-term, interrupts the shopping center in a location that may not make sense for current or foreseeable future use of the site. Extending through existing tenant space will be disruptive.

Response: The north-south connection is key to provide a safe, direct route between the BRT station along Hudson Road and points north of the shopping center, whose buildings were identified as a major barrier and safety issue for the surrounding neighborhood. The connection can likely be designed so as to remove only one tenant suite alongside the automobile driveway cutting through the buildings, thereby limiting the negative impact on the shopping center. Rerouting pedestrians and bicyclists west to Pederson Street would put them in a place that currently has few effective "eyes on the street," would not provide a direct functional and visual connection to destinations to the north, would not address the building barrier issue, and would not create a spine of activity within the shopping center to set up effective, double-loaded future redevelopment. Routing pedestrians and bicyclists through the unmodified existing shopping center would require trespassing and would not address the barrier/safety issue. No revision to the draft plan is recommended.

4. Issue: Rezoning the Sun Ray shopping center to T4 unrealistically hinders incremental development that moves the site toward the higher-density vision. It may be a plan for creating blight.

Response: T4 zoning at the Sun Ray shopping center allows for incremental development, such as a new pad building, that conforms to T4 design standards. The design standards may reduce flexibility in placement of buildings and increase development costs, but they do not prohibit small scale incremental development and they ensure that any such development furthers the transit-oriented development vision for the area. Also, there is flexibility in the nonconforming use regulations that allow small expansions of nonconforming buildings as long as the expansion does not increase its nonconformity. Allowing additional, larger-scale development under B2 standards would further entrench the existing development pattern and make the eventual transition to transit-oriented development more difficult and less complete.

The plan to transition to a transit-oriented development future does not require the existing shopping center to be unsuccessful or blighted. Rather, the rezoning allows portions of the center to transition to a high-intensity transit-oriented development

product as market conditions allow. This is less a matter of the existing shopping center's success than it is of future growth in the market for transit-oriented development at this location. The T4 zoning district, with its unlimited FAR and potentially unlimited height, does more than any other zoning district to remove limits on the market potential for transit-oriented development. No revision to the draft plan is recommended.

5. Issue: An assessment of historic resources should be conducted prior to BRT location decisions.

Response: Such assessment is being conducted prior to the BRT location decisions as part of the project's Draft Environmental Impact Statement (DEIS) study currently managed by Washington County Regional Rail Authority. No revision to the draft plan is recommended.

6. Issue: Property impacts to all historic properties shall be considered and avoided in choosing a BRT alignment.

Response: The draft plan states that the BRT alignment and station location should "(a)void property impacts, particularly to affordable housing and locally designated historic buildings" in the Mounds Station Area. The DEIS or other historic survey work may identify other historic properties meriting preservation, beyond the locally designated historic buildings in the Mounds Station Area. The plan language should be amended so that in each station area the BRT alignment and station location should "(a)void property impacts, particularly to affordable housing and ~~locally designated~~ historic buildings."

7. Issue: Buildings with historic character should be preserved in all station areas.

Response: The draft plan states that "(b)uildings with historic character should be preserved" in four of the station area chapters' Future Character sections, excepting only the Sun Ray Station Area. This was an inadvertent staff oversight. The plan should be amended so this statement is also included in the Sun Ray Station Area chapter.

### **NEIGHBORHOOD PLANNING COMMITTEE RECOMMENDATION**

The Neighborhood Planning Committee recommends that the Planning Commission approve the attached draft resolution recommending approval of the Gold Line Station Area Plans, associated plan amendments proposed therein, and zoning study with the following amendments:

1. The Sun Ray Station park & ride is recommended to be placed and designed so as to not remove the St. Paul Youth Services building.
2. The Sun Ray Station park & ride is recommended to be placed "at or near the southeast corner of Pederson Street and Wilson Avenue".
3. All station area chapters should state that the BRT alignment and station location should "(a)void property impacts, particularly to affordable housing and ~~locally designated~~ historic buildings."
4. Buildings with historic character should be preserved in all station areas.

5. The document's discussion of the Sun Ray shopping center should include further clarification that redevelopment will occur only when the private sector chooses, and that, whether redevelopment is incremental or complete, the plan envisions introduction of an urban street grid.

**Attachments**

1. Draft Planning Commission resolution
2. HPC resolution
3. Stinson Leonard Street (Sun Ray) letter
4. St. Paul Youth Services letter
5. Draft July 24, 2015 Planning Commission minutes (excerpt)
6. Draft Gold Line Station Area Plans document, dated June 11, 2015 (provided previously to Planning Commissioners)