SAUNT CONING APPEAL APPLICA <u>To/From Board of Zoning Appeals</u> Dept. of Safety & Inspections Zoning Section 375 Jackson Street, Suite 220 Saint Paul, MN 55101-1806 (651) 266-9008		To / From Planning CommissionDept. of Planning & Econ. Devt.Zoning Section1400 City Hall Annex, 25 W 4 th St.Saint Paul, MN 55102-1634(651) 266-6583	Zoning Office Use Only File # Fee Paid \$ Received By / Date Tentative Hearing Date		
APPELLANT					
	Address	City	State	Zip	
	Email Phone				
PROPERTY	Project Name				
	Planning Administra	sion , under provisions of Zoning Coc ator or Zoning Administrator. er provisions of Zoning Code § 61.702 the Planning Commission.			
Date of de	cision	, 20 Fi	ile Number		
made by an a		I feel there has been an error in any r r in fact, procedure or finding made b necessary.			

Please see attachment

If you are a religious institution you may have certain rights under RLUIPA. Please check this box if you identify as a religious institution.

Appellant's Signature _

a -/

__ Date __

May 7, 2020



City of Saint Paul Department of Safety and Inspections 375 Jackson Street, Suite 220

St. Paul, MN 55101

RE: Appeal of the Board of Zoning Appeals (BZA) Decision #20-024086 Application for three (3) Variances to construct a 12-unit multi-family building ("Project") at 1769 Grand Avenue, St. Paul, MN 55105 ("Subject" or "Property")

Dear Mayor Carter and Members of the City Council,

Please accept this letter as our formal appeal of the City of Saint Paul's Board of Zoning Appeals (BZA) decision to deny the subject Application for Project Variances. On April 27, 2020, we presented our application for three (3) variances from the City's Legislative Code to construct a new 12-unit multi-family building at 1769 Grand Avenue. We believe the Project will enhance this block of Grand Avenue and may become the catalyst for increased investment at this important Macalester-Groveland Neighborhood Node. To assist in your review of our appeal, we are pleased to provide the following Project and process highlights:

Key Project Highlights:

- This Project will be the first redevelopment on the block to support and implement the City's recently updated 2040 Comprehensive Plan ("2040 Plan"). Further, it will be the first multi-family redevelopment on the block in over 50-years. This Project will set the tone for new infill development in the Grand-Fairview Neighborhood Node.
- Designed as an architecturally interesting multi-family building with multi-level 3-bedroom and 4-bedroom units that provide increased rental diversity and desperately needed housing choice to the City. It includes:
 - \circ $\;$ High quality exterior material selection with intentional window sizes and articulation.
 - **Roof-mounted solar system** with the potential to offset the building's electrical consumption by 107%, contributing to the City's and District Council's sustainability goals.
 - Secured bicycle storage enclosure for a minimum of 12 bikes to support modal choice of the residents year-round.
- The Project is designed to embrace and encourage non-vehicular modes of transportation including walking, biking, and public transit.
 - **"Walk Score**" for this site is **78: very walkable**. The Project is steps from the Grand-Fairview Neighborhood Node and the small businesses lining Grand Avenue that provide dining, goods, services, and employment opportunities.
 - "Bike Score" for this site is 78: very bikeable. Dedicated bike lanes are offered on Summit Avenue directly behind the Property and stretch from the banks of the Mississippi to the I-35E trail. Fairview Avenue offers striped shoulders that provide safe access south from Grand Avenue to Ford Parkway.
 - "Transit Score" for this site is 51: good transit. Four bus stops serviced by local route 63 are within a short distance to the Property on Grand & Fairview and Grand & Wheeler. The Subject Property is less than ½ mile from the METRO A-Line Bus Rapid Transit station on Snelling Avenue and Grand Avenue.

Process Summary:

- Reviewed Saint Paul's recently updated **2040 Comprehensive Plan to ensure our Project was consistent with the uses and density guided** for the Subject Property.
- Conducted extensive due diligence and background analysis to understand the existing conditions including review of the current block configuration and patterns, so that the **Project would fit into the existing streetscape and enhance the walkability of this area**.
- Proactively met with City Staff, including Public Works (12.12.19), Site Plan Review (12.12.19) and Planning & Economic Development (01.23.20) to get feedback and inform our architectural design and site plan.
- Toured the site with the Macalester-Groveland Community Council ("MGCC") Executive Director to learn more about MGCC's long-range goals (01.15.20).
- Provided a memo to the MGCC and public at large to solicit feedback about the Project (03.18.20).
- Engaged adjacent property owners within 350' of the Property to introduce the Project and garner input (03.19.20).
- Submitted the Application for Variances to the City as described herein (03.30.2020).
- Presented the Project to the **MGCC (District 14)** Housing and Land Use Committee. 43 members of the public attended the Zoom meeting. The MGCC voted in support of the Project 12-4 and **recommended approval of the Variances** to the BZA and City of Saint Paul (04.22.2020).
- Presented the Project to the BZA (04.27.2020).
 - The **Staff Report recommended approval of the requested variances**, stating that each requested variance adequately met the City's ordinance and demonstrated that practical difficulties warranted their approval. (City Legislative Code Section 61.601).
 - BZA denied the Application for three Variances based on Finding #4. (See Attachment 1)
- Submitted this application to formally Appeal the BZA's decision to deny the requested Variances to the City Council. (City Legislative Code Section 61.702(a)).

We assert the **BZA failed to make adequate findings regarding their basis for denial**. The BZA identified Item #4 as their sole basis which states, "The plight of the landowner is due to circumstances unique to the property not created by the landowner." The BZA's corresponding finding states, "There is no unique circumstance to the property. The plight of the landowner is self-created. This finding is not met for all variance requests." This statement does not include any support or specific findings regarding "why" they concluded there are no unique circumstances, and we make the argument that there are several circumstances unique to the Property that have not been created by the landowner. The issue of "unique circumstances" was discussed minimally, at best, by the BZA commissioners and at no time did anyone ask us for clarification regarding this item. Instead, the BZA commissioners made their conclusion arbitrarily, and without providing any substantive reasons or findings for their denial. The commissioners closest mention of a substantive finding was a discussion that the building is too tall, and that we were simply trying to "fit" a building that is too big on a lot that is too small. While height and scale were discussed as a concern, we surmise that the height and scale could not be a finding because our Project complies with those dimensional standards of the RM2 zoning district.

Perhaps our Application narrative could have been more descriptive regarding the "circumstances unique to the property" and as such, we offer the following *additional* analysis for your review and consideration. It is our belief, that with this additional information, you will come to the same conclusion as the Macalester-Groveland Community Council, DSI City staff, and our design team that *there are unique physical characteristics* of this Property that necessitate the requested variances.

1769 Grand Avenue – Property Context (See Attachment 2):

The 2040 Comprehensive Plan ("2040 Plan") guides the Subject Property's land use as Urban Neighborhood, Neighborhood Node (Grand-Fairview). The Subject Property is located approximately 400-feet from the intersection of Grand Avenue and Fairview Avenue, and approximately 2,200-feet (0.4 miles) from the Grand Avenue and Snelling Avenue intersection. Grand Avenue is served by local bus route 63, and Snelling Avenue is served by the METRO A-Line Bus Rapid Transit system and local route 84. There are dedicated bike paths on Summit Avenue directly behind the Property and striped shoulders on Fairview Avenue. The Subject is zoned RM2, and the surrounding properties consist of a mix of uses including multi-family, single-family, commercial, and retail. The Property is 50-feet wide by 200-feet deep, and it is the only remaining historically single-family platted lot on the northerly block of Grand Avenue between Fairview Avenue and Wheeler Street South.

To support our assertion that the BZA failed to make adequate findings, and that their conclusion was in error, we provide the following additional analysis for each requested variance for your consideration:

<u>Variance #1: Lot Size Minimum.</u> Property zoned RM2 requires 1,500 SF of lot area per dwelling unit. The proposed Project provides 866 SF of lot area per dwelling unit.

BZA Finding: *"There is no unique circumstance to the property. The plight of the landowner is self-created."*

Applicant's Summary Response to Finding: The existing lot size, configuration, and duplex use does not align with the City's 2040 Comprehensive Plan that guides this Property for higher densities and multi-family use. The Applicant did not create the current policy conflict between the 2040 Plan and current RM2 zoning, and furthermore, the Applicant did not create the current lot configuration.

Applicant's Suggested Findings Regarding the Requested Variance:

- The Subject Property is the last remaining historically platted single-family lot on the north side of the block, which is a unique physical condition created by the City's approval of lot combinations on adjacent properties. The resulting lot size is regular for single-family uses, but the lot width is substandard to site a proportional multi-family building. The existing lot configuration was not created by the landowner, and the planned multi-family use is guided by the City.
- The existing duplex is likely to become legally non-conforming regarding lot area because it does not meet the City's 2040 Plan for density. If the duplex is demolished, the Property must be developed consistent with the 2040 Plan which requires multi-family uses.
- The Subject Property is within a Neighborhood Node and is guided Urban Neighborhood, which guides and encourages properties to be redeveloped with multi-family and mixed-uses. Figure LU-4 of the 2040 Plan prescribes a density range of 15-55 dwelling units per acre in the Urban Neighborhood land use designation. (See Attachment 3)
- The Subject Property is less than ½ mile from the METRO A-Line BRT station on Snelling Avenue and Grand Avenue. Figure LU-5 of the 2040 Plan assigns density Goals for properties within ½ mile of Bus Rapid Transitways as a minimum of 25 units per acre, with a Target of 40-75 units per acre. (See Attachment 3)
- The Subject Property is zoned RM2, which requires 1,500 SF of lot area per dwelling unit, or approximately 29 dwelling units per acre. This does not meet the density Target as established in Figure LU-5. (See Attachment 3)

- The City is currently updating its RM2 zoning district for consistency with the 2040 Plan, but that process is not complete.
- The proposed density of the Subject Project is 50 dwelling units per acre, which is consistent with the 2040 Plan Figures LU-4 and LU-5. (See Attachment 3)

<u>Variance #2: Side Yard Setback.</u> The RM2 zoning district requires a 9-foot side yard setback. The proposed Project provides a 6-foot side yard setback from both the east and west property lines.

BZA Finding: *"There is no unique circumstance to the property. The plight of the landowner is self-created."*

Applicant's Summary Response to Finding: The current lot configuration in conjunction with the surrounding development pattern defines the character of the streetscape, and a 9-foot side yard setback on the Subject Property will not align with how existing structures are configured on the block. The lot configuration is substandard with respect to lot width for multi-family uses and is excessive with respect to lot depth. This results in a unique physical circumstance that warrants encroachment into the side yard setbacks, so that a functional multi-family building with supporting rear-yard parking can be developed consistent with the City's 2040 Plan.

Applicant's Suggested Findings Regarding the Requested Variance:

- The Subject Property is the last remaining historically single-family platted lot on the north side of the block, which dates to the late 1800's. The lot was sized to accommodate single-family uses, and adjacent properties on the block were all similarly platted. As market conditions changed, the City approved lot combinations on all the adjacent properties, which left the Subject Property in its current configuration (long and narrow).
- The lot width is correlated to the streetscape and pedestrian environment. A building's mass and proportion at the sidewalk and street level impacts how a streetscape feels and its desirability for walking and/or biking.
- Six-foot side yards as proposed are consistent with existing setback conditions already established by adjoining properties, which creates an enjoyable experience for passersby.
- The existing structure is setback approximately 3-feet from the westerly property line, and the proposed Project will reduce the nonconformity from this property line.
- The setbacks of the property should be reasonably proportional to the site dimensions and the use. Given the substandard lot width for a multi-family use, enforcing the code as written will adversely impact the character of this block and the pedestrian experience.
- Encroachment into the side yard allows for the maximization of parking spaces in the rear-yard of the Subject Property, which was identified as essential to both the Macalester-Groveland Community Council and adjacent property owners.
- By allowing a modest encroachment into the side yard, the requested parking variance is minimized to the extent possible.

<u>Variance #3: Parking.</u> The RM2 zoning district requires 19 parking stalls, and the Subject Project provides 12 parking stalls.

BZA Finding: "There is no unique circumstance to the property. The plight of the landowner is self-created."

Applicant's Summary Response to Finding: The existing lot configuration is substandard with respect to lot width and cannot support an underground parking structure. The proposed Project is within ½ mile of the METRO A-Line BRT and should be treated as a transit-oriented-development. It is not possible to provide the number of parking stalls required and meet the Target density ranges prescribed in the 2040 Plan.

Applicant's Suggested Findings Regarding the Requested Variance:

- The parking configuration is constrained on site due to the substandard lot width for multi-family uses.
- The City's dimensional standards for parking spaces, drive lanes, and turning movements do not allow for underground parking on the Subject Property. This is a condition of the substandard lot width, which is a condition not created by the Applicant.
- In addition to lot width constraints, the existing topography of the site does not allow for an adequate grade change to construct an underground parking structure that could exceed the number of parking stalls the Project currently proposes at grade. The topography is a physical (natural) characteristic of the Subject Property, which is a unique characteristic of the Property not created by the Applicant.
- The proposed parking ratio of 1 space per 1 dwelling unit is consistent with parking requirements of properties located in comparable transit-oriented districts within the region. This is further supported by the Metro Transit who prepared a study of residential development trends in the City of Minneapolis that identified a decline in parking ratios and parking demand for transit accessible projects between 2014 and 2018.
- The Project will supplement available automobile parking stalls with an enclosed bike storage facility with the capacity to securely park a minimum of 12 bicycles year-round.
- The site is within ½ mile of the METRO A-Line BRT and should be developed to encourage residents to use transit rather than rely on personal vehicles. Similarly situated properties in the City's transit corridors are zoned within a T-district, which provides parking incentives to transit-oriented uses and densities. The City's RM2 zoning district does not provide any parking incentives, but the City's 2040 Plan emphasizes the importance of high-density multi-family uses within ½ mile of high-frequency transit routes to minimize reliance on personal vehicles.

In conclusion, we respectfully disagree with the conclusion and finding of the BZA, who relied solely on finding #4 in the attached resolution. As demonstrated through this letter's additional analysis and supporting exhibits, our proposed Project is consistent with the 2040 Comprehensive Plan adopted by the City Council, and the requested variances are necessitated by the unique characteristics of the existing lot configuration.

We look forward to presenting our appeal and discussing our Project with you. If you have any questions regarding the information in this letter prior to the meeting, please do not hesitate to contact me now or in the future.

Very cordially,

Lucas Wiborg

Chief Financial Officer Good Timing, LLC a MN LLC

p: (612) 741-5112 e: lwiborg@shinglecreekcapital.com

w: shinglecreekcapital.com/1769-grand-ave

<u>Attachments:</u> Attachment 1: Board of Zoning Appeals Resolution; Zoning File Number: 20-024086 Attachment 2: Project Context Attachment 3: Excerpts from the 2040 Comprehensive Plan

CITY OF SAINT PAUL Deadline for Action: May 28, 2020 BOARD OF ZONING APPEALS RESOLUTION ZONING FILE NUMBER: 20-024086 DATE: April 27, 2020

WHEREAS, Lucas Wiborg, Good Timing LLC has applied for variances from the strict application of the provisions of Sections 66.231 & 63.207 of the Saint Paul Legislative Code pertaining to dimensional and parking requirements in order to construct a five-story, 12-unit multi-family building. The following variances are requested: 1.) A lot size of 1,500 square feet per unit is required, the applicant is proposing 866 square feet per unit, for a variance request of 634 square feet per unit. 2.) A side yard setback of 9' is required per side, 6' is proposed per side, for a variance request of 3' per side. 3.) 19 off-street parking spaces are required, 12 are proposed, for a variance request of 7 parking spaces. This property is located in the RM2 zoning district at 1769 Grand Ave. PIN: 042823420024; and

WHEREAS, the Saint Paul Board of Zoning Appeals conducted a public hearing on April 27, 2020 pursuant to said application in accordance with the requirements of Section 61.601 of the Legislative Code; and

WHEREAS, the Saint Paul Board of Zoning Appeals based upon evidence presented at the public hearing, as substantially reflected in the minutes, made the following findings of fact:

1. The variance is in harmony with the general purposes and intent of the zoning code.

The applicant is proposing to demolish an existing duplex to construct a fivestory, 12-unit multi-family building consisting of five 3-bedroom apartments and seven 4-bedroom apartments.

The zoning code requires of 1,500 square feet of lot area per unit and the applicant is proposing 866 square feet per unit, for a variance request of 634 square feet per unit. A side yard setback of 9' is required per side, 6' is proposed per side, for a variance request of 3' per side. Based on the proposed number of rooms in each unit, 21 off-street parking spaces are required. However, according to Sec. 63.210 in the zoning code, bicycle parking may be substituted for up to ten (10) percent of minimum off-street parking requirements. For the purpose of calculating a substitution, four (4) spaces in a secure bicycle rack are the equivalent of one (1) parking space. Since 21 parking spaces are required, the applicant is proposing to install bicycle racks that can accommodate up to 12 bicycles, which allows them to deduct 10% of the total parking requirement (two (2) spaces), resulting in the reduction of the amount of required off-street parking spaces to 19. The applicant is proposing 12 parking spaces, for a variance request of 7 parking spaces.

There is public transit available in the immediate area as two bus stops are located at the end of block to the west at the corner of Fairview Ave. S. & Grand Ave. Two more bus stops are located at the other end of the block to the east at the corner of Wheeler St. S. & Grand Ave. This property is also located one block away from a dedicated bike path on Summit Ave. According to the applicant, this development aims to attract residents who are drawn to the walkability of the neighborhood, thereby lessening the dependence on a privately-owned vehicle for transportation. This supports the applicant's request for the parking variance.

The existing lot size with half of the alley is 10,394 square feet; it does not have sufficient lot area to meet the requirements for density, side yard setbacks and off-street parking to allow the proposed building to be constructed.

The RM2 medium-density multiple-family residential district is intended to provide for more extensive areas of multiple-family residential development as well as uses that serve the needs of the multiple-family residential districts. It is intended to provide for comprehensive development of multifamily uses and a balance of population concentration near major thoroughfares, transit, and related facilities.

The proposed multi-family building will provide housing along a preferred transit network, which encourages residents to utilize multiple modes of travel such as walking, biking, or public transit. Provided the applicant does the following: 1) Bike racks that can support 12 bicycles are installed and maintained so that they are accessible especially in winter months. 2.) A snow removal plan is developed that will not adversely affect the adjoining properties or impede the flow of traffic in the alley. 3.) The parking lot be striped according to the site plan submitted with this variance application, this project aligns with the general purposes and intent of the zoning code to:

• Provide for safe and efficient circulation of all modes of transportation, including transit, pedestrian and bicycle traffic.

• Promote and to protect the public health, safety, morals, aesthetics, economic viability and general welfare of the community.

This finding is met for all variance requests

2. The variance is consistent with the comprehensive plan.

According to the applicant, this development is intended for people of all ages and provides an option for affordable living for those who are willing to share a flat, and/or desire to live adjacent to neighborhood amenities and service providers. As described, this project and requested variances align with Policy H.2 of the Macalester-Groveland's Community Plan to, "Preserve Macalester-Groveland's peaceful community, while promoting a range of housing types and affordability to meet the needs of all people throughout their life and changing lifestyle needs."

Additionally, the project is supported by Policy LU-1.42 of the land use chapter of the Comprehensive Plan to promote the development of housing in mixed-use neighborhoods that supports walking and the use of public transportation.

Furthermore, the applicant's request is consistent with Policy LU-1.21 of Land Use Plan to balance the following objectives for Mixed-Use Corridors through the density and scale of development: accommodating growth, supporting transit use and walking, providing a range of housing types, and providing housing at densities that support transit.

Finally, Policy H-1.3 of the Housing Chapter supports revitalizing the city by developing land-efficient housing. This is the last low-density home on this block and that the entirety of the residential uses on the block have developed multi-unit housing and that redeveloping the site as proposed supports the development of land-efficient housing. This finding is met for all variance requests.

3. The applicant has established that there are practical difficulties in complying with the provision, that the property owner proposes to use the property in a reasonable manner not permitted by the provision. Economic considerations alone do not constitute practical difficulties.

The applicant has established a practical difficulty in complying with the density, setback, and off-street parking requirements as follows:

• The lot is narrow with only 50' of lot width. This makes it difficult to construct a functional multi-family building with the minimum width of 32' in order to meet the required 9' side yard setbacks because it would result in a narrow looking structure which could detract from the character of Grand Ave. and affect the functionality of the building interior.

• A higher density building could be constructed on this lot without the density variance if the applicant gets the density bonus allowed in the code under Sec.66.231 (c) by providing an underground garage. However, in this case, underground parking cannot be provided due to the narrowness of the lot and the required dimensional standards for parking spaces and maneuvering lanes.

This leaves the applicant the only option of providing parking spaces in the rear yard. This finding is met for all variance requests.

4. The plight of the landowner is due to circumstances unique to the property not created by the landowner.

There is no unique circumstance to the property. The plight of the landowner is self-created. This finding is not met for all variance requests.

5. The variance will not permit any use that is not allowed in the zoning district where the affected land is located.

Multi-family buildings and off-street parking are permitted in this zoning district. This finding is met for all variance requests.

6. The variance will not alter the essential character of the surrounding area.

The proposed building is similar to the character and density of the surrounding structures as there are several other multi-family buildings on this block, and in this area, with a similar number of units, that have nonconforming side yard setbacks, and do not provide the required amount of parking spaces because they are all legally nonconforming since they were all built prior to October 25, 1975.

This project and the requested variances will allow a duplex that is out of scale with the rest of the properties on the block to be demolished and a new multi-family dwelling constructed that will have a similar density level, setbacks, and off-street parking as the other multi-family dwellings on this block. It will not alter the character of the area. This finding is met for all variance requests.

NOW, THEREFORE, BE IT RESOLVED, by the Saint Paul Board of Zoning Appeals that the request to waive the provisions of Sections 66.231 & 63.207 pertaining to dimensional and parking requirements in order to construct a five-story, 12-unit multi-family building on property located at 1769 Grand Ave.; and legally described as Elmer & Morrison'S,Rearrangeme Lot 6 Blk 3; in accordance with the application for variance and the site plan on file with the Zoning Administrator **IS HEREBY DENIED.**

MOVED BY: Morales SECONDED BY: Maddox IN FAVOR: 6 AGAINST: 1

MAILED:

TIME LIMIT: No decision of the zoning or planning administrator, planning commission, board of zoning appeals or city council approving a site plan, permit, variance, or other zoning approval shall be valid for a period longer than two (2) years, unless a building permit is obtained within such period and the erection or alteration of a building is proceeding under the terms of the decision, or the use is established within such period by actual operation pursuant to the applicable conditions and requirements of the approval, unless the zoning or planning administrator grants an extension not to exceed one (1) year.

- APPEAL: Decisions of the Board of Zoning Appeals are final subject to appeal to the City Council within 10 days by anyone affected by the decision. Building permits shall not be issued after an appeal has been filed. If permits have been issued before an appeal has been filed, then the permits are suspended and construction shall cease until the City Council has made a final determination of the appeal.
- **CERTIFICATION:** I, the undersigned Secretary to the Board of Zoning Appeals for the City of Saint Paul, Minnesota, do hereby certify that I have compared the foregoing copy with the original record in my office; and find the same to be a true and correct copy of said original and of the whole thereof, as based on approved minutes of the Saint Paul Board of Zoning Appeals meeting held on April 27, 2020 and on record in the Department of Safety and Inspections, 375 Jackson Street, Saint Paul, Minnesota.

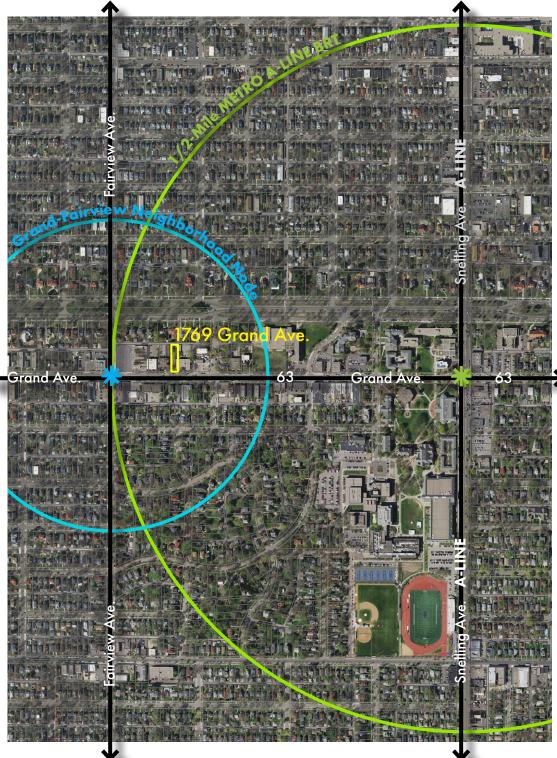
SAINT PAUL BOARD OF ZONING APPEALS

Maxine Linston Secretary to the Board

ATTACHMENT 2:PROJECT CONTEXT

Project Overview	
Project Site:	1769 Grand Avenue
2040 Land Use:	Urban Neighborhood Neighborhood Node
Location:	Within 1/2-Mile of METRO A-LINE BRT On local Bus Route 63

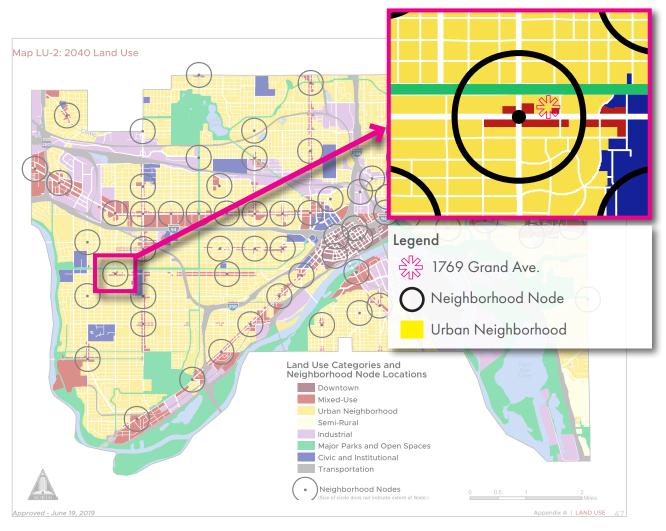
Map 2.1: Project Context



ATTACHMENT 3: EXCERPTS FROM THE 2040 COMPREHENSIVE PLAN

Project Overview	
Project Site:	1769 Grand Avenue
2040 Land Use:	Urban Neighborhood Neighborhood Node
Location:	Within 1/2-Mile of METRO A-LINE BRT On local Bus Route 63





Source: City of Saint Paul 2040 Comprehensive Plan

ATTACHMENT 3: EXCERPTS FROM THE 2040 COMPREHENSIVE PLAN

Project Overview	
Project Site:	1769 Grand Avenue
2040 Land Use:	Urban Neighborhood Neighborhood Node
Location:	Within 1/2-Mile of METRO A-LINE BRT On local Bus Route 63

Figure LU-4: 2040 Residential Land Use Density Ranges*

Land Use Type	Base Range	At Neighborhood Node	
Downtown	30-300 units/acre		
Mixed-Use	15-75 units/acre	20-200 units/acre	
Urban Neighborhood	7-30 units/acre	15-55 units/acre	
Semi-Rural	2-15 units/acre n/a		
Citywide**	20 units/acre		

*Density ranges represent a goal for new development averaged across the generalized future land use type. Individual projects may exceed targeted goals.

**Metropolitan Council's requirement for communities with the urban core designation. All of Saint Paul falls within this category.

Source: City of Saint Paul 2040 Comprehensive Plan

Figure LU-5: Transit Density Goals*

Distance from transit	Transit type	Min (units/acre)**	Target (units/acre)***
	Fixed rail transitway	50	75-150
1/2 Mile	Bus rapid transitway	25	40-75
	Arterial bus rapid transit	15	20-60
1/4 Mile	High-frequency transit	10	15-60

*Average for new development in areas identified in a station area plan as appropriate for redevelopment.

**Minimum represents an average goal for new development.

***Individual projects may exceed target goals.

Source: City of Saint Paul 2040 Comprehensive Plan