



Payne-Phalen

COMMUNITY COUNCIL

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City of Saint Paul, City Council
15 Kellogg Blvd. West, 310 City Hall
Saint Paul, MN 55102

Sent via e-mail to:
Contact-Council@ci.stpaul.mn.us

August 31, 2020

Re: RM Zoning Study: Proposed changes to Multi-Family Residential Districts

Dear City Council,

I am writing to you on behalf of the Board of Directors of the Payne-Phalen Community Council. The Board of Directors met in regular session on Tuesday evening, August 25th through an online meeting platform. The published agenda included an item on the request from the City of St. Paul for feedback related to the RM Zoning Study: Proposed changes to Multi-Family Residential Districts. The Board packet included information from the City about the proposed ordinance update. Our Board discussed the matter with members of the community who were in attendance.

Based on the conversation, the Board offers the following comments related to the rezoning study:

- Within our district, there is a high level of both interest and concern about housing policy, housing regulation, and housing investments by the City of St. Paul.
- In general terms, PPCC is supportive of zoning updates that bring the City's zoning code into compliance with the adopted policies of the comprehensive plan. That said, it's not clear why the City is pursuing zoning changes to parcels that have out-of-date land use guidance. Any update to the zoning code should be based on the land use policies and land use maps that were recently updated and adopted by the City Council *as part of the 2040 Comprehensive Plan*.
- In more specific terms, there are some places in Payne-Phalen that should no longer be guided by RM zoning (particularly parcels on Payne Avenue). As we understand it, the RM district does allow many of the commercial uses that would help make Payne Avenue more vibrant. The adopted policies in the 2040 plan indicate land uses on for Payne Avenue allow, indeed *encourage*, commercial and retail uses at street-level along District 5's commercial corridors – particularly along Payne Avenue starting from East 7th Street on the south to Maryland Avenue and Wheelock Parkway on the north. The recommendations of the current study as proposed

would seem to complicate bringing that vibrancy forward in years to come.

- Any update to the zoning code by the City should focus on the necessary changes to allow and incorporate transit-oriented development on and along our commercial corridors, especially in areas in close proximity to the intended Rush Line Bus Rapid Transit project.
- Any zoning changes that would continue disparity and confusion between City policy and ordinance should be avoided. In other words, we do not recommend using outdated zoning *district maps* as the basis for changes to the zoning code. The parcels included in the RM zoning districts should reflect only those parcels that continue to have such guidance in currently adopted policy.

During the discussion in our meeting, there was a significant level of confusion and concern raised by the community and the Board about what the city's goals might be for tackling this particular housing issue at this particular time - and why the City is proposing something that to many seems very complicated at a time when the minds, energy, and focus of the community are elsewhere.

- In the conversation, Board members and community members grappled with whether the form and intensity changes proposed in the RM study would improve and enhance affordability, accessibility, and ownership - or whether these changes would thwart progress on these matters. In particular, many in the meeting wondered whether such changes might actually fuel gentrification by encouraging redevelopment, displace existing naturally occurring affordable housing complexes,, and therefore causing residents to be displaced.
- There was confusion about the actual language of the Planning Commission resolution and the reality that the format in which the information is presented (marked up code) is inaccessible to a non-expert audience. That caused some to express doubts about the City's intentions for doing this work at this time.
- In particular, it was noted that the study does *not* situate the policy intentions of the project within the larger conversation happening about housing affordability across the city and the community. Several participants expressed a desire for material that offered a more concise summary or policy overview written in a way that is easily understandable and digestible by a community audience. The City was more successful in communicating the purpose and details of the SAFE Housing ordinance so there was concern about why this project - which is also critical to the future of housing in the City - did not have the same sort of effort to create digestible information and widespread publicity.
- It's important for the City Council to know that while the minutia and detail of the project are perhaps necessary and laudable from an internal staff perspective, the external communications were at best off-putting to some in the community. Others simply felt that perhaps the City was actively trying to get something passed in the cover of a time of crisis (i.e. without taking the time to ensure the materials were accessible and the purpose clear and transparent from a wider policy perspective).

It should be noted that in the month prior to the onset of COVID-19, our colleagues in PED offered to spend time with our district council on this topic. And for that we are very grateful. Since that time however, our own work has taken a hard turn. Actually, it's taken several hard turns. We've worked very hard to be responsive to community need on the ground while simultaneously keeping up with ongoing City projects. This letter is written so that you are aware of and have a record of our attempt to engage the community on this important matter, because we do not want any silence from our end to be interpreted as a lack of community interest. But we know that you know that in the last six months, there simply hasn't been enough time and bandwidth in the community to delve into and focus on such complex studies and to sort through their far-reaching implications for the community. While we appreciate the City's need to keep internal work moving projects, we also hope you have an understanding in the great interest and great need to draw out a wider and deeper community conversation on these matters in the coming year.

With all of this in mind, Payne-Phalen Community Council voted to support updates to the zoning ordinance, to the zoning districts, and to the zoning district maps with the understanding and strong recommendation that any such changes would be based on the policies, land uses, and specific land use maps that the City Council already approved and adopted *in the 2040 Comprehensive Plan*. Any changes to the RM districts should include updates to the district maps so that the location of RM districts are consistent with and in conformance with the newly adopted policies and land use maps recently approved by the City Council.

We appreciate you including this letter in the record related to this proposed ordinance change. And thank you in advance for taking the position of the Payne-Phalen Community Council into consideration as you make your decision. Please feel free to contact me if you have any questions or require further clarification.

Sincerely,



Jack Byers
Executive Director

- cc. Council President Amy Brendmoen, Ward 5
Councilmember Nelsie Yang, Ward 6,
Councilmember Jane Prince, Ward 7
Luis Pereira, Planning Director
Bill Dermody, City Planner
Athena Hollins, Board President
Rebecca Nelson, Board Secretary
PPCC Board of Directors