The purpose of this analysis is to examine the structure of Saint Paul’s existing zoning code and related ordinances, to explore which of the City’s existing zoning districts might be applicable to all or portions of the Ford site, and to assess the potential effectiveness of these districts in achieving the project’s vision and goals.

BACKGROUND

The Saint Paul Zoning Code is a conventionally written (i.e., text-based) but urban design-oriented code. Zoning districts are grouped into categories from least to most intensive:

3. Traditional Neighborhood Districts – Mixed-Use Districts – T1 through T4. The four districts provide for a wide range of uses and levels of density/intensity, including a full range of residential, civic, institutional, office, and commercial uses, as well as limited production and processing uses, with standards for urban form and design. Design standards address street/alley and block layout, minimum/maximum density and height, building placement and street orientation, parking placement (side or rear), building articulation and materials, public/private realm trees and landscaping, lighting, and sidewalks.
4. Business Districts – ranging from Office-Service through B1, BC (converted residence), through B5
5. Industrial Districts – ranging from IR through I3, the industrial districts provide for a full range of civic, institutional, office, commercial, and industrial uses, as well as for mixed commercial-residential uses. Draft amendments are being studied to update these districts, restrict mixed residential uses to upper floors in I1-I2 districts, and add design standards specifically tailored to the industrial districts. Transitional Industry District (IT) proposed to replace IR (Light Industrial Restricted).
6. A Planned Development District is designed to replace existing zoning for larger sites (at least 1.5 acres) that are suitable for a unified and self-contained design approach.

OVERLAY DISTRICTS

Four River Corridor Overlay Districts are “designed to provide comprehensive floodplain and river bluff management for the city” in accordance with state requirements for the Mississippi River Critical Area and floodplain. The districts are the RC1 River Corridor Floodway District, RC2 River Corridor Flood Fringe District, RC3 River Corridor Urban Open Space District and RC4 River Corridor Urban Diversified District. A significant portion of the Ford site is covered by the RC3 District, which allows a maximum building height of 40 feet. Areas below the river bluff are zoned RC1 and RC2.

Design-oriented overlay districts are developed for particular planning areas. They pre-date the Traditional Neighborhood Districts. These include:

- Shepard Davern Commercial and Residential Redevelopment Overlay Districts: the Commercial Redevelopment Overlay is designed to promote hotel and higher-density multi-family housing development with design standards similar to the Traditional Neighborhood Districts. The residential overlay employs similar standards for multi-family housing.
- White Bear Avenue Overlay District: to facilitate implementation of recommendations in the White Bear Avenue small area plan, design standards similar to the Traditional Neighborhood Districts are employed.
- Hillcrest Village Overlay: incorporates White Bear Avenue overlay standards.
- East Grand Avenue Overlay: to “provide design standards and building height, size, and footprint limits, and to reduce the shortage of parking in the east Grand Avenue area.” Applies T2 design standards, limits building footprint to 25,000 SF, limits building size to 75,000 SF and building height to three (3) stories and 30-40 feet, depending on uses. Standard minimum parking exception for changes in use does not apply.

Other overlay districts have been developed for specific areas and specialized conditions. They do not apply to the Ford site. The Airport Overlay districts, which do affect the Ford site, are managed through the Metropolitan Airports Commission.
## Major Development Scenarios

### 1. AUAR Baseline - Primary Reuse for Industry
- **T1**: Doesn't include retail. Potential use in residential apartment/condo area along Cleveland if other uses acceptable (alt. RM1)
- **T2**: Modest retail; civic and educational uses along Ford Parkway
- **T3**: Could be applicable, limited neighborhood development
- **T4**: Not very applicable; proposed building heights unlikely to reach T4 levels
- **IT**: Would fit majority of the site
- **Other**: Green infrastructure features; open space: maybe R1; Low-density apt./condo: RM1/RM2

### 2. Mixed Use - Light Industrial / Flex Tech
- Lacks sufficient intensity and mix of uses
- Retail / mixed use along Ford Parkway; some transitional residential if other uses acceptable
- Option for residential and mixed-use sub districts
- 0.5 min. FAR and 75' max. height exceed intensity proposed in scenario
- Would fit light industrial sector of the site
- Green infrastructure features; open space; Townhouse, apt./condo: RT2, RM1, RM2

### 3. Mixed Use - Office/Institutional
- Lacks sufficient intensity and mix of uses
- Retail / mixed use along Ford Parkway; some transitional residential if other uses acceptable
- Option for entire site
- 0.5 min. FAR and 75' max. height exceed intensity proposed in scenario
- Not applicable - no light industrial
- Green infrastructure features; open space; Townhouse, apt./condo: RT2, RM1, RM2

### 4. Mixed Use - Urban Village
- Lacks sufficient intensity and mix of uses
- Retail / office along Ford Parkway; some transitional residential if other uses acceptable
- Option for entire site
- 0.5 min. FAR and 75' max. height exceed intensity proposed in scenario
- Not applicable - no light industrial
- Green infrastructure features; open space: maybe R1; Single-family: R1; Townhouse, apt./condo: RT2, RM1, RM2

### 5. Mixed Use - High Density Urban Transit Village
- Lacks sufficient intensity and mix of uses
- Retail / office along Ford Parkway
- Could be applicable, with conditions for taller buildings
- Applicable for entire site, with height restrictions in RC Overlay
- Not applicable - no light industrial
- Green infrastructure features; open space: maybe R1; apt./condo: RM1, RM2

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**ZONING DEVELOPMENT SCENARIO MATRIX**

Comments pertain to the applicability of current city zoning categories to each of the five conceptual development scenarios.
The five scenarios envisioned for the Ford site encompass a broad range of uses, which could be captured only by a broad range of zoning districts. The following are some options that use or adapt the City’s existing districts:

TRADITIONAL NEIGHBORHOOD DISTRICTS (T DISTRICTS)

Among the potentially applicable districts in the City’s zoning code are the Traditional Neighborhood Districts, which have been widely used to support transit-oriented development and new urban villages. According to the statement of intent, “TN traditional neighborhood districts are intended to foster the development and growth of compact, pedestrian-oriented urban villages. All four (4) districts are intended to encourage a compatible mix of commercial and residential uses within buildings, sites and blocks; new development in proximity to major transit streets and corridors; and additional choices in housing.”

- “T1 traditional neighborhood district is intended to provide for compact, pedestrian-oriented mixed-use areas of limited size, with a variety of residential, office and service uses that primarily serve neighborhood needs.” It has been used in several small-scale neighborhood districts such as Como Avenue/Luther Seminary and along West 7th Street. It overlaps with the OS district in some respects.
- “The T2 traditional neighborhood district is designed for use in existing or potential pedestrian and transit nodes. Its intent is to foster and support compact, pedestrian-oriented commercial and residential development that, in turn, can support and increase transit usage.” T2 has been used quite widely along high-frequency transit corridors and shopping precincts, including Highland Village.
- “The T3 traditional neighborhood district provides for higher-density pedestrian- and transit-oriented mixed-use development.” It is designed for areas that are large enough to support all or part of a neighborhood: mixed uses, a variety of housing types, an interconnected street network, and an open space system. It has been used in a few areas including, several large master planned districts in conjunction with those master plans. Master plans in T3 are now optional (a 2011 change). T3 has also had substantial use along University Avenue in the Central Corridor.
- The recently adopted T4 district “provides for high-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, where a greater reliance on transit makes high-density mixed-use development possible and desirable.” It has seen substantial use in station areas along the Central Corridor.

RELEVANT COMPONENTS OF THE T DISTRICTS

- Minimum and maximum residential densities and floor-area ratios (FARs). These range from FARs of 0.3 - 1.0 in the T1 District to a minimum FAR of 0.5 in the T4 District, with the option of using a percentage of structured parking toward the minimum.
- Some site-specific setback and height requirements, primarily along segments of University Avenue, indicating that these are based on detailed station area plans.
- Design standards for each district. These are defined in terms of broad objectives, with some flexibility permitted. For example, “buildings anchor the corner,” “definition of residential entries,” “building façade articulation.” Some of the standards, such as those for building materials and minimum transparency, are more specific.
- Residential parking standards are somewhat more flexible than in other zoning districts outside downtown. In the T1 and T2 districts, minimum off-street parking for residential uses is reduced by 25% for properties within one-quarter mile of a high-frequency transit street. In the T3 and T4 districts, the 25% reduction applies to all residential uses.

Most of the commercial areas in Highland Park have been zoned T2.
ASSESSMENT OF T DISTRICT ZONING

Based on discussion with City staff, the T districts appear to have worked well over a broad range of conditions (especially along high-frequency transit streets) since they were adopted in 2004, and have been well-received by community members. In 2011, T district design standards were revised and updated based on experience.

Possible amendments to districts along the Central Corridor are being studied to include allowances for accessory units and requirements or incentives for affordable housing. These provisions could also be applicable to the Ford site. The option for reductions in off street parking in proximity to transit provides for greater design flexibility and more efficient use of land, as well as supporting car-free living and its associated socio-economic and environmental benefits.

T2-T4 districts allow limited production and processing, with a conditional use permit required for uses of over 15,000 square feet of floor area, making these districts potentially suitable for a range of workplace uses. The master plan option for T3-4 districts is relevant for the Ford site, since it is likely that any development would require a master plan. The City’s experience with previous master plans has been mixed. Some master plans, such as the West Side Flats plan, have not drawn the desired response from the development community while others, such as the Victoria Park plan, have struggled with changing market conditions. Depending on how it is written, a T3 – T4 master plan may be very detailed and directive or maybe more flexible to adapt to changing market conditions.

Possible adjustments to the T district regulations could include:

- Use of supplementary diagrams such as axonometric views of site development parameters to provide more clarity and guidance. In our experience, a combination of illustrations and text provides multiple methods of understanding for different users of the code.
- Inclusion of provisions and metrics for achieving sustainability, such as solar access and orientation, lighting, and building efficiency. (There are already some requirements for solar orientation in the subdivision regulations.)

OVERLAY DISTRICT OPTIONS

The existing design-oriented overlay districts have been employed as a way to implement small area plans. Most of these districts predated the creation of the Traditional Neighborhood districts in the early 2000s. The T districts were designed in part to capture many of the desired urban design features of these districts and avoid the need for multiple similar overlays.

An overlay district could encompass many of the desired landscape, open space, stormwater management and other sustainability features that will be important for the Ford site, while leaving the parameters for land use and site design to the underlying district such as T3, IT, etc.

The level of detail included in an overlay needs to be balanced against the complexity of the underlying district(s). A high level of detail in both the overlay and the “base” could make it more difficult to create and implement a development plan, compared to a single new district.

REVISED INDUSTRIAL DISTRICTS

The proposed revisions to the industrial districts include the following changes:
- More restrictive separation distances and improved screening for outdoor processing.
- Updated standards for outdoor uses such as hazardous waste transfer, recycling facility and other heavy industrial uses.
- Amendments to renamed “IT” district: “The IT transitional industrial district is intended to provide sites for commercial, office and light industrial uses that are compatible with nearby residential and traditional neighborhood districts, parks, and parkways.”
- Merger of I2 and I3 districts to create a single “Industrial General” district.
- Modifies some of the T district design standards to apply to the “I” districts to varying degrees, including parking placement, building façade articulation, street tree placement, transparency and building materials.

Based upon public review of these proposals, it appears that the design standards may not be applied to the I2 and/or I3 districts, and that these districts may remain separate. However, it appears that the IT and possibly I1 districts are potentially applicable to portions of the Ford site.
**OTHER CITY REGULATIONS**

Zoning districts are not the only determinants of development for the Ford site. Many other regulations in the City Code may apply.

Subdivision regulations are a part of the Zoning Code (Chapter 69). Subdivision requirements generally apply to lot divisions less than 20 acres in size. Most subdivisions require a plat, largely an administrative procedure. However, the City Council, in its review of a proposed subdivision, is charged with considering “the requirements of the city and the best use of the land being subdivided. Particular attention shall be given to the width and location of streets, sidewalks, suitable sanitary utilities, surface drainage, lot sizes and arrangements, as well as requirements such as parks and playgrounds, schools and recreation sites and other public uses.”

Subdivision requirements include design standards for blocks, lots and streets. The right-of-way and roadway width for arterial and collector streets are prescribed, while requirements for local streets are determined by the Director of Public Works. Block standards are fairly permissive: block lengths in residential areas may not exceed 1,000 feet, where the typical St. Paul block is 660 feet in length. Standards for parkland dedication, tree preservation, and protection of other natural features are also included.

Stormwater management standards are included in the City’s subdivision requirements, but are also governed by the stricter and more detailed Capitol Region Watershed District standards, and sometimes by more site-specific studies. As discussed in the “Sustainable Stormwater Feasibility Report for the Ford Plant Site,” stormwater management will require a high level of collaboration among city, watershed district, and state regulators based on more detailed site investigations, and may or may not be governed by zoning.

Licensing requirements specify minimum separations between on-sale liquor establishments such as restaurants and brewpubs. Liquor establishments must be more than 300 feet from churches and schools. New liquor licenses may be granted in commercial development districts, as established by the City. Six such districts have been established to date, including the downtown district. A restaurant license is required in conjunction with all new Liquor - On Sale Licenses except in the Downtown Development District.

Sign controls are contained in Chapter 64 of the Zoning Code, which includes standards by zoning district and for over fifteen special sign districts. Many of the special sign districts were established to prohibit advertising (off-premises) signs, which are now prohibited citywide. A few districts also include design requirements intended to improve the appearance of a commercial corridor (for example, White Bear Avenue) or reference a separate sign plan that includes dimensional, design, and other regulations and standards.

Off-Street parking requirements, including those for bicycles, are contained in Chapter 63. In addition to the T District parking requirements in Chapter 66, this section provides for a 100% reduction – essentially removing the minimum off-street parking requirement – for traditional neighborhood districts when over 50% of both the building and the parcel are within one-quarter mile of University Avenue. Requirements may also be reduced for shared parking, bicycle parking, and shared vehicle parking. Bicycle parking is required for residential units and in conjunction with vehicular parking. Developments exceeding minimum parking by certain percentages are subject to a conditional use requirement and additional landscaping requirements.

**PLANNED DEVELOPMENT DISTRICT**

The PD District is currently used for only five sites within the City. The district requirements (Section 66.880) are mainly procedural, with no design standards beyond the required findings by the Planning Commission and City Council – that the proposed development must not be in conflict with the Comprehensive Plan; is designed to provide a desirable and unified environment, will not burden parks and schools, etc. Such requirements are typical of many similar “PUD” districts in the metropolitan area and elsewhere.

Staff’s experience has been that these districts are difficult to administer because the development requirements are unique to each site, making them awkward to reference and difficult to change as the developments evolve. The option of ultimately rezoning existing sites to PD standard city districts has been discussed. If the desire is to provide some site specific requirements to the Ford redevelopment, an overlay district with underlying zoning may be simpler to apply than a PD district.
POTENTIAL ADDITIONS TO CITY REGULATIONS

City regulations do not cover many of the aspects of sustainable development discussed in the “Roadmap to Sustainability.” Elements such as building energy consumption, water conservation, urban agriculture (City currently studying), street and public space design, and night sky radiation are not currently found in the city code. Some of these elements, such as the design of streets, parks and public spaces, are generally led by City departments and guided by various planning documents. Building energy consumption and efficiency are addressed by Saint Paul’s Green Building Policy and by state building guidelines (B3). A number of these elements are worth considering as possible additions to the city code, and will be explored further as part of the Zoning Framework process.

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