



CITY OF SAINT PAUL

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DATE: December 30, 2020
TO: Comprehensive and Neighborhood Planning Committee
FROM: Anton Jerve, Principal City Planner and Mike Richardson, Senior City Planner
SUBJECT: District 12 Plan Update Draft Review

Background

The District 12 (Saint Anthony Park) 10-year Plan is an update to the previous plan adopted in 2008 and amended in 2013. Neighborhood plans are generally updated every ten years, need to be consistent with the citywide comprehensive plan. The Saint Anthony Park Community Council (SAPCC) undertook an extensive survey and engagement process in 2017. In-depth information can be found beginning on page 61 of the attached plan. The SAPCC submitted numerous drafts for review and discussion with city staff with the final draft submitted in July 2020. Review of the District 12 Plan by the Planning Commission was put on hold until the 2040 Comprehensive Plan was adopted by City Council, which happened in November 2020.

Conformance with the 2040 Comprehensive Plan

The plan is generally in compliance with the 2040 Comprehensive Plan with edits to six housing policies, discussed below.

The City Attorney's Office has raised two issues with the following housing policies in the plan that will need edits prior to adoption:

- H2.2. Support including units for families (2- and 3-bedroom units) in new developments with more than 12 units.
- H2.3. Support including units that are affordable for households making less than 60% of the area median income and that further the community goal of equitable housing in new developments with more than 12 units.
- H3.1. Support the community goal of intergenerational housing by requesting that new developments with at least 12 units include at least 30 percent of units for

families (2- and 3- bedroom units). Leverage community input opportunities to gain these types of family housing goals.

- H3.2. Support the community goal of equitable housing by requesting that new developments with more than 12 units include at least 30 percent of units that are affordable for households making less than 60% of the area median income. Leverage community input opportunities to gain these types of affordability housing goals.
- H6.1. For new development of more than 12 units, support rezoning, variance, or public funding only if the development will permanently provide units that are affordable for households making less than 60% of the area median income, and further the community goal of equitable housing.

First, several of these policies can be interpreted to presuppose support by the City for projects meeting certain thresholds. The 2040 Comprehensive Plan is aligned with the need to provide affordable housing but given the dynamic nature of housing developments the City cannot preapprove or predict its support at certain thresholds because there may be other priorities, issues, policies, or thresholds that are more pertinent – including the availability of affordable housing gap financing. Second, these policies are too specific in terms of affordability and/or size. The City cannot support affordability requirements for specific unit amounts or types, or levels in terms of percentage of Area Median Income (AMI), or percent of units though this plan. This would pre-empt the City’s process for an inclusionary zoning study, as called for in Policy H-41 of the 2040 Comprehensive Plan. An inclusionary zoning study should be conducted in comprehensive manner with a citywide approach and overseen by the Mayor’s Office, Planning Commission, and City Council.

PED staff believe will be able to draft some mutually acceptable edits that retain the intent of the policies between now and when the plan returns to the Comprehensive and Neighborhood Planning Committee. For example, preliminary edits sent to District 12 included:

- *“Provide District 12 support for projects that...”*
- *“Prioritize projects that...”*
- *“Larger housing projects (more than 12 units) may meet District 12 housing goals by...”*

Revised policies will be shared with the Comprehensive and Neighborhood Planning Committee once they are drafted.

Beyond conformance with the 2040 Comprehensive Plan, it should be noted that the District 12 Plan provides policy direction beyond the typical chapters. The District 12 Plan includes the following additional chapters:

- Equity
- Climate Change
- Business and Economic Development

These chapters are a first for a district plan and will provide a helpful model to other district councils initiating a neighborhood planning process.

Other Plans

The current District 12 Plan (adopted 2013) will be decertified with the adoption of this plan.

Recommendation

Staff recommends that the Comprehensive and Neighborhood Planning Committee forward this memo and the draft plan document to the Planning Commission to release for public review and recommends setting a public hearing date of February 19, 2021.

Attachments

Attachment A: [Saint Anthony Park Draft Community Plan July 2020](#)

cc: Ward 4 Office
District 12