# Seward Longfellow Greenway Area Land Use and Pre-Development Study

## Table of Comments and Staff Responses

This table includes all of the substantive comments received regarding the plan draft released for public review. In a few cases, the comments are edited for brevity. Other verbatim written public comments are included separately.

| Page # | Section/Paragraph | Issue | Comment or suggested changes | Party | Staff Response/Recommendations |
|---|---|---|---|---|---|
| I-8 and<br><br>II-12 | Land Use Plan<br><br>Industrial Use to Multi-Family Residential | "Live-Work" Land Use Designation | Depictions and descriptions of future land uses adjacent to the Greenway at or about 29th Avenue are somewhat different and should be clarified.<br><br>Areas to the north and south of the Greenway at or about 29th Avenue South are referred to as the "island of residential". This entire area is zoned I-1, despite the fact that it consists primarily of low-density residential uses in addition to the few industrial users adjacent to the Greenway. The land use plan identifies this area as "live-work", but the plan's text describes future land uses a little differently:<br><br>"The Land Use Plan recommends that the area one block north and one block south of the Greenway at 29th Avenue be residential use, but not exclusively. The goals of this plan include a balance between residential and industrial use and it might be best exemplified in the vision for these few blocks. Here, the plan envisions higher-density residential uses adjacent to the Greenway with the option for residents, ground level studios, offices or workshops."<br><br>The plan also illustrates this envisioned development adjacent to the Greenway on pages I-10 and II-12. In addition to the residential components, any "work" component would unlikely be industrial, but more like those uses allowed Office-Residence Districts or home occupations in Residence Districts. | CPED-Planning (Larson) | Staff recommends supports for the flexible vision described in the plan. However, "Live-Work" is not a convention that we will use for future land use maps.<br><br>These definitions of live-work fit within a variety of regulatory options that include home occupation regulations, the Office-Residence zoning district and the Industrial Living Overlay District. As a result, the proposed adapted land use policy plan maps shows a combination of 1) medium density residential facing the greenway with low density residential uses behind; and 2) transitional industrial uses.<br><br>Zoning options could include the Residence or Office-Residence Districts or application of the ILOD for a more intensive housing/workshop concept. |

| | | | | | |
|---|---|---|---|---|---|
| I-8 and<br><br>II-12 | Land Use Plan<br><br>Industrial Use to Multi-Family Residential | "Live-Work" Land Use Designation | Although noted as a type of land use in the Land Use Diagram, "Live-Work" is not clearly defined in the plan. Paragraph 2 of page 12 in Section II seems to describe what is intended by "Live-Work": "…residential uses…with the option for residents' ground level studios, offices or workshops." But in the table under in Section II page 30, the Development Concept is described as "mixed office, studio, workshop and multi-family residential." This could be interpreted to mean these uses should be interspersed throughout the building. The intended principal reuse of the building is not clear. Is the intent to reuse the building primarily for residential with some home occupations? Or would a proposal where half of the building would be used for nonresidential purposes, such as offices, and the other half for multifamily meet the intent?<br><br>Live-work is not a term used in the zoning code. When applying the code, the use described above would either be a mixed-use building (multiple principal tenants with separate entrances for residential and nonresidential uses) or a home occupation (an accessory use of a residence subject to many restrictions defined in Ch. 535 Article VII of the zoning code). As principal uses, studios and workshops are only allowed in the commercial or industrial districts. These districts also allow a wide variety of other commercial and industrial uses, which does not seem to meet the intent of the plan. When an industrial building is converted to a residential building, many Building Code or Fire ordinances apply that may further limit the types of "live-work" uses allowed or make a project economically infeasible. Language that clearly defines the intent should be incorporated into the plan. (Land Use Diagram is found in Section I Page 8, Section II Page 9 and Section III Page 44) | CPED-Development Services | See immediately above. |

| | | | | | |
|---|---|---|---|---|---|
| I-8 | Land Use Plan | Designation of west side of 33rd Avenue south of 26th Street. | What is the purpose of leaving industrial land use on the block bound by 33rd Ave S, 26th St E, 34th Ave S and the greenway instead of recommending all residential? The existing uses in the I1 districts appear to be a warehouse, a workshop, parking lots and a 4-plex. These uses usually have a low number of employees. A large, empty parking lot is underutilization of the land. There could also be an opportunity to reconnect 33rd Ave and 27th St E and eliminate two dead-ends. | CPED-Development Services | The plan supports the option of new or improved industrial uses in this "transitional industrial" area. The illustration on page II-21 shows a redevelopment scenario that 1) redevelops the Empire Glass building to residential uses and 2) involves industrial site plan/access improvements that re-orient truck access to 33rd Avenue. The site plan for the former Star Tribune building becomes re-oriented from 34th Avenue to 33rd Avenue. A truck turnaround is illustrated as part of this. This will create a better separation between industrial and residential uses along the Greenway. |
| I-8 and elsewhere | Executive Summary: Land Use Plan | Consistency w/ adopted plan for Lake Street/Midtown Transit Station Area | The land use map….shows the area south of 28th Street and east of 26th Avenue as industrial (it is a very small area), but the Council adopted Hiawatha-Lake Station LRT plan (on page 44) shows this spot as residential, so I see a possible conflict there. | CPED-Development Services (Voll) | The adapted land use policy maps exclude this area, so the immediate conflict is avoided. The entire block was part of the recent rezoning study for the Lake Street/Midtown Transit Station Area. The conclusion of the study was to apply the ILOD to the portion of the block that included 7-Sigma rather than rezone the site to a Residence District. |
| I-9 and II-35 | Industrial to Multi-Family Residential | Language re: nonconforming use rights | The plan says that nonconforming uses can not rebuild. The state law on this has changed since this draft was written, so that property can be rebuilt, but it will still be more difficult than if they were not nonconforming. | CPED-Development Services (Voll) | Staff recommends that the companion document accurately clarify state law and city processes regarding non-conforming uses. |
| I-9 and II-11<br><br>11-35 | Industrial to Multi-Family Residential<br><br>Implementation | Non-conforming use rights | Current state law allows reconstruction of a legal nonconforming use when its structure is damaged or destroyed and the cost of restoration exceeds 50% of its market value if a building permit is applied for within 180 days of when the property was damaged or destroyed. | CPED-Development Services | Staff recommends that the companion document accurately clarify state law and city processes regarding non-conforming uses. |
| I-10 | Industrial Uses and Employment | Setbacks and open space | Clearly describe that building setbacks should be reduced in Section I Page 10 Industrial Uses and Employment first bullet point: "reducing building setbacks from the street." Setbacks can | CPED-Development Services | The plan suggests that site plans west of 27th Avenue are inefficient, reducing the potential job density in the area. The implication is to reduce unnecessary setbacks, not supercede |

| | | | | | |
|---|---|---|---|---|---|
| | | | also apply to parking lots, outdoor storage, etc. Removal of landscaped yards could conflict with policies of the comprehensive plan and the zoning code. | | yard and pervious surface requirements. It is one suggestion among a number of ideas to improve job density and perhaps provide opportunity for relocation of Greenway fronting business from the east. |
| I-11, II-21 and II-23 | Empire Glass Development Scenario | Consistency w/ Site Plan Review standards in Zoning Code | The conceptual drawing show parking between the residential building and the public street, which is not allowed by the zoning code. | CPED-Development Services (Voll) | The conceptual site plan illustrated is an unusual configuration given that it fronts a public greenway as well as a city street. Staff recommends that further discussions about the site involve consultations with staff familiar with parking location and other site plan requirements. |
| I-12 and<br><br><br>II-15 | Executive Summary: Next Steps<br><br><br>Links to Lake Street, Matthews Park and Franklin Avenue | Pedestrian and bike friendly north/south connectors | The plan identifies 29th, 34th Avenue, 38th and 42nd Avenues as routes for "wider sidewalks, pedestrian-scale lighting and more intensive landscaping" and that these should "redevelop with more intensive housing uses over time".<br><br>A case might be made for better connecting Lake Street, the Greenway and the public open spaces of Matthews Park, Brackett Park and Anne Sullivan School. These routes are somewhat equidistant from each other and are low volume local streets. However, the plan did not specifically consider land uses or redevelopment potential along these routes nor did it identify feasibility or funding rationale for transforming these local streets in such dramatic ways.<br><br>Other efforts are more appropriate for identifying and implementing pedestrian/bicycle improvements, such as the City's bicycling planning efforts. This concept could be further explored, but it should not be considered policy for these streets. | CPED-Community Planning (Larson) | Staff recommends that these comments be included in the companion document. |
| I-12 and | Executive Summary: Next Steps | Crossing of 34th Avenue | The plan suggests an extension of 34th Avenue where it currently does not exist between 27th Street and 28th Street. This would be associated | CPED-Community Planning | Staff recommends that these comments be included in the companion document. |

| | | | | | |
|---|---|---|---|---|---|
| II-21 | Empire Glass (Design Workshop #1) | | with redevelopment of the Shasta Building site and Empire Glass.<br><br>Given the large number of at-grade crossings that interrupt the Greenway, staff does not recommend a new at-grade crossing of cars. | (Larson) | |
| I-12<br><br>II-7<br><br>II-28<br>II-30 | Executive Summary: Next Steps<br><br>Guiding Principles for Infrastructure<br><br>Gamber Roofing/ Doppler Gear Development scenario | Vacation of 27th Street. | The recommendation to vacate 27th Street conflicts with one of the Guiding Principals for Design Features "….maintaining the traditional street grid…" listed in Section II page 7.<br><br>The recommendation to vacate a portion of 27th Street East is first mentioned in the table from Section II page 30. The intent of the vacation should be mentioned in the Executive Summary section as well as the Land Use Plan section before the Workshop table. A description of the reasons for the recommendation should also be incorporated.<br><br>----------<br><br>Twenty-Seventh Street is not a continuous street on the north side of the Greenway. The plan suggests the vacation of a segment between 29th and 30th Avenues. This has the effect of increasing the developable area of the Gamber Roofing property, but further reducing the continuity of the street.<br><br>Community Planning and Development Services staff do not concur with the street vacation component of this scenario. Staff believe that maintaining a street adjacent to the Greenway is important for the following reasons:<br><br>1. CPTED principles: Activity and movement adjacent to the Greenway by pedestrians, bicyclists, and vehicles, | CPED-Development Services<br><br>----------<br><br>CPED-Community Planning (Larson) | Staff recommends that the companion document state that the City does not support a vacation of 27th Street. |

| | | | | | |
|---|---|---|---|---|---|
| | | | (including both residents and visitors), increases the safety of the Greenway.<br>2. The Greenway is more likely to function as the "front door" of development if there is a street or drive in front of the development.<br>3. The plan for Phases 1 and 2 calls for an adjacent street or promenade on one or the other side of the Greenway where it currently does not exist.<br>4. Additional setback and boulevards may be beneficial as freight rail continues to utilize the corridor.<br><br>Community Planning staff understand that the public was exposed to an idea that would extend 27th Street for purposes of truck access to industrial properties. Staff supports the extension of 27th Street, but only as a local access component of residential redevelopment adjacent to the Greenway. Truck traffic should continue to use the designated truck route of 26th Street.<br><br>Staff also acknowledges that given the alignment of the Greenway east of 34th Avenue, 27th Street is far enough from the Greenway to accommodate development between 27th Street and the Greenway. This is reflected in the Empire Glass and Gopher Roofing redevelopment scenarios. | | |
| II-6 | Vision, Principles and Strategies for Evolution<br><br>2nd paragraph | Long-term industrial areas vs. areas transitioning to residential | A conflicting statement with the goals of the plan is made in the second paragraph under **Vision, Principles and Strategies for Evolution** in Section II page 6 describing future land use. Suggested language: "In the long term….some of the industrial properties east of 27th Avenue South in this area ~~is~~ are well suited for residential use." | CPED-Development Services | Staff does not recommend changing the text as this distinction is made clear throughout the plan. |

| | | | | | |
|---|---|---|---|---|---|
| II-6 | Guiding Principles for Development and Use | Feasibility of meeting all principles | We concur with the "Guiding Principles for Development" found on page II-6. However, we question how readily it may be possible to "Balance the desires for a residentially-focused neighborhood with strategies for retaining valued industries that offer greater "job density," higher pay scales and have low impact on neighborhood livability." If specific industries, or types of industries, are envisioned as meeting these balancing criteria, we request that they be enumerated. Job density, higher pay scales and low impact on the neighborhood seem to offer a particularly rare combination. | CPED-Business Development (Harrington) | Comments stand by themselves and can be used to manage expectations about change. |
| II-7 | Guiding Principles for Development and Use | Buffering between industrial and residential uses | As a potential enhancement to the Guiding Principles for Design Features found on page II-7, we recommend consideration be given to adding the concept of creating buffers (buffering activities) between industrial and residential uses, in addition to or instead of creating transitions between uses. Complementing this approach would be the development and adoption of design guidelines that elaborate on how the principles could and should be implemented. | CPED-Business Development (Harrington) | Comments are duly noted. Design guidelines for specific sites and blocks can be an exercise initiated by multiple parties including the CDC or neighborhood group. |
| II-8<br><br>III-7 | Coordination with Earlier Plans<br><br>Previous Planning Efforts | Consistency with other adopted plans | The recently adopted *Industrial Land Use and Employment Policy Plan* and *Hiawatha/Lake Station Area Master Plan* overlap some of the area covered by this plan and should be incorporated into Section II Page 8 *Coordination with Earlier Plans* and Section III Page 7 with a description of how the plans complement or conflict with each other. | CPED-Development Services | This section does mention the Hiawtaha/Lake Station Area Master Plan. The Seward/Longfellow Greenway Plan designates the Minnehaha Mall site as Transit-Oriented, Commercial (Preferred Mixed-Use), which is consistent with the Hiawatha/Lake Plan. For the overlapping blocks adjacent to the Greenway, both plans designate these areas as industrial.<br><br>The research and public input process for this plan informed the Industrial Land Use and Employment Policy Plan. It is not an earlier plan. No change is recommended. |
| II-10 | Industrial Use Evolving to | Managing land use | Although the plan, on page II-10, discusses the | CPED- | Comprehensive plan designations and |

| | | | | | |
|---|---|---|---|---|---|
| | Multi-Family Use | change and avoiding potential future conflicts | expectation that "change will occur incrementally over time," it does not appear to address how these changes are to be managed over an extended period of time, particularly if they result in a potential for increased friction between existing and emerging land uses. We suggest such a discussion would be a worthwhile addition to any report addressing incorporating this plan into the comprehensive plan. | Business Development (Harrington) | rezoning studies will take into consideration the impact of market timing, the potential for new land use friction, and the size and configuration of parcels.<br><br>It is the position of staff that the identified opportunity sites are unlikely to cause undue new friction between land uses. However, any changes in the transitional industrial area will require more careful consideration. Proposals in these locations will likely require some kind of city assistance and engagement. This will be the time to address such matters. |
| II-11 | Industrial Uses Remaining as Industrial Uses:<br><br>Bulleted list of principles | Lack of implementation mechanism to fulfill principles for new industrial | Paraphrased:<br>The following principles do not appear to identify any implementation mechanism to be used to hold such uses accountable. We suggest adding a discussion that references the need for zoning modifications and/or design guidelines and/or performance standards as implementation mechanisms.<br><br>• "Uses adjacent to residential areas are not heavily truck-dependent.<br>• The uses offer higher wage jobs and a higher density per acre of employment.<br>• The uses are non-polluting.<br>• The uses address the Greenway as a public way and a recreational amenity.<br>• Mitigation of impacts on adjacent or nearby residential properties is mitigated on the industrial parcel.<br>• The industrial uses, whatever their impact, visually screen parking, loading docks, outside storage and noise from neighboring residential uses and the Greenway." | CPED-Business Development (Harrington) | Implementation mechanisms include zoning and site plan regulations and enforcement, property owner engagement, marketing strategies, and performance standards tied to public assistance. |

| | | | | | |
|---|---|---|---|---|---|
| II-13 | Industrial Use to Multi-Family Residential<br><br>2nd paragraph | Non-conforming use rights | An expansion of a nonconforming use is allowed if several findings can be made and are approved by the Planning Commission. | CPED-Development Services | Staff recommends that the companion document accurately clarify state law and city processes regarding non-conforming uses. |
| II-13 | Intensifying Industrial Uses and Employment | Setbacks and open space | The second bullet point under Intensifying Industrial Uses and Employment in Section II Page 13 is too vague. "Setback areas" could be interpreted to mean between a building and the street or greenway. Locating parking, loading or outdoor storage in these setback areas would not meet the intent of this plan, the comprehensive plan or the zoning code. Further, areas used for landscaping and lawns may be necessary for to stormwater management. Suggested language: "Reducing setback areas between adjacent industrial properties~~, which are currently used solely for landscaping and lawns,~~ in favor of useable, aggregated common space." | CPED-Development Services | The plan suggests that site plans west of 27th Avenue are inefficient, reducing the potential job density in the area. The implication is to reduce unnecessary setbacks, not supercede yard or pervious surface requirements. It is one suggestion among a number of ideas to improve job density and perhaps provide opportunity for relocation of Greenway fronting business from the east. |
| II-13 | Intensifying Industrial Uses and Employment<br><br>Bulleted list of principles | Consistency with zoning | The four bulleted points proposed as opportunities for increasing density would seem to necessitate modifications to zoning and/or site plan requirements. Clarification of this question would be beneficial. | CPED-Business Development (Harrington) | The barriers to achieving greater industrial density are more likely market related than regulatory. Such an analysis could accompany a future rezoning study. |
| II-17 | Opportunity Sites | Outdated reference | A housing development is being constructed north of Target and Cub Foods. Section II Page 17 Paragraph 1 should be updated. | CPED-Development Services | Staff recommends that the companion document simply make note of any significant changes in the area since the plan was completed. |
| II-24 and II-25<br><br>II-30 and II-31 | Development scenario tables | Relationship of workshop scenario to plan | For reader reference, label the purpose of the tables in Section II pages 24-25 and 30 so it clearly states that these are recommendations of the plan and not just conclusions of the workshop. | CPED-Development Services | The tables represent prototypical development scenarios evaluated for financial feasibility and community support. As a result, they were used to identify appropriate land use classifications on the land use map. |
| II-24 and III-38 | Shasta building redevelopment/re-use scenario | Alternative re-use and economic feasibility | The table in Section II Page 24 indicates that the Shasta building should only be reused for residential purposes. In Section III page 38, the | CPED-Development Services | The "Development Concept" is one scenario to evaluate feasibility. The text makes mention of Live-Work on the Shasta Site, and |

| | | | | | |
|---|---|---|---|---|---|
| | | | plan states that most of the site should be redeveloped as housing and indicates that the Shasta building could be used for nonresidential purposes. To increase potential reuse of the Shasta building, low intensity nonresidential uses (i.e. uses allowed in the residential, OR-1 or OR-2 districts such as places of assembly, schools, offices, or museums) could be listed under *Development Concept*. It should also be clarified in other areas of the plan where the Shasta building is discussed. | | the plan more or less explicitly discusses changes that reduce the intensity of industrial uses in the eastern part of the corridor, but which support employment uses. OR-1 or OR-2 are possible rezoning outcomes. |
| II-25 and II-31 | Development scenario tables | Building form/mass and zoning | The table in Section II pages 25 and 31 under Building Organization limits the type of development to rowhouses and large multifamily dwellings on the Gopher Roofing site. A multifamily dwelling could step down towards the single- and two-family neighbors and still meet the intent. Also, no more than one principal residential structure is allowed on a zoning lot unless the development is a planned unit development or a cluster development. A PUD must have at least two acres. Structures in a cluster development are limited to 2.5 stories in height. | CPED-Development Services | Comments are duly noted. The development scenarios are prototypical, not prescriptive. Staff recommends that further discussions about the site involve consultations with staff familiar with subdivision and zoning requirements as well as the intent of this plan. |
| II-25 and II-31 | Development Character Guidelines | Consistency w/ Site Plan Review standards in Zoning Code | …the design workshop guidelines speak of orienting the development towards the greenway, which is fine, but it should also be oriented to the public street too…... | CPED-Development Services (Voll) | Staff recommends that any engagement with prospective developers emphasize this point. |
| II-25, II-31, and II-37 | Various zoning references | References to a Midtown Greenway Zoning Overlay District | The table in Section II pages 25 and 31 under Building Mass and Height and Section II page 37 references the Midtown Greenway Zoning Overlay District. A Midtown Greenway Zoning Overlay District does not exist nor is an overlay discussed/recommended in the plan. The goals of the plan can be accomplished without creating a new overlay district. | CPED-Development Services | The companion document will make note that there is no Midtown Greenway Overlay District. |

| | | | | | |
|---|---|---|---|---|---|
| II-34 and II-35 | Implementation | Coordination with Seward Redesign<br><br>Pollution remediation funding and liability reduction | We find the Implementation section on pages II-34 and II-35 useful. As part of our future work plans we anticipate participating in the Project Feasibility Analysis (page II-35). In fact, CPED Business Development staff looks forward to the opportunity to work with Seward Redesign (and others) in coordinating and undertaking remediation "investigations that might lead to a better understanding of contamination and redevelopment potential." However, regarding site contamination, we find that the report fails to note, as a significant factor, the existence of at least three major funding sources (DEED, Metro Council and Hennepin County) for pollution remediation grants that are available to assist developers. Furthermore, recent (2002) changes in federal legislation reduce the real and perceived risk associated with purchasing and redeveloping contaminated sites. We suggest inclusion, if possible, of this information in any report addressing incorporation of this report into the city's comprehensive plan. | CPED-Business Development (Harrington) | Comments are duly noted. CPED-Planning staff will request brief summary information to accompany the companion document. |
| III-7 | Previous Planning Efforts | Official status of prior plans | The Section "Previous Planning Efforts" starting on page III-7. It might be helpful to indicate the ones that have been adopted by the City Council. | CPED-Development Services (Voll) | The companion document should list officially adopted plans as reference. |
| III-10 | Existing Conditions | Accuracy of existing land use map | On the Existing Land Use diagram found in Section III page 10, many properties are incorrectly classified e.g. parking lots are classified as "parks and recreation" and where Target is located, the property is classified as "office". | CPED-Development Services | The companion document should alert readers to these errors and to refer to the updated existing land use map. |
| III-12 | Proposed Land Use Map | Erroneous title | The map on page III-12 is confusing to me because is says it is the Minneapolis Plan Proposed Land Use, but I don't think we have a proposed land use map, unless I'm misreading this. | CPED-Development Services (Voll) | The companion document should alert readers to this error and to the fact that the City is developing a land use plan as part of the update of its comprehensive plan. |
| Various | Opportunity Sites | Loss of industrial land | It appears that the plan identifies 6 locations (1. Gopher Roofing and several surrounding parcels, | CPED-Business | The plan encourages greater efficiency in industrial development site planning, one |

| | | | | | |
|---|---|---|---|---|---|
| | | | 2. Empire Glass, 3. the Shasta Building, 4. Gamber Roofing, 5. [a parcel owned by] Hauenstein & Burmeister, and 6. Doppler Gear) as "Opportunity Sites" that would transition from light industrial to residential and/or mixed use. This conversion would represent a net loss of slightly more than 10 acres of industrial use and corresponding employment. We strongly recommend that an equivalent acreage be added to an existing industrial zone (or future Employment District as identified in the Industrial Land Use Study). In view of the extremely limited universe of available industrial locations, relocation of the uses in the "opportunity sites" can be expected to be subject to strong competition for potential sites by alternative industrial users. | Development (Harrington) | important objective of which is to provide potential sites for displaced uses. |
| Various maps | Land Use Plan | Map readability | For reader reference, label all existing buildings referenced in the plan on the Land Use Diagram or land use diagram, e.g. Hiawatha Metal Craft, Mack Engineering, Gamber Roofing, Doppler Gear, Gopher Roofing, Empire Glass, and Deep Rock. | CPED-Development Services | Staff recommends that the companion document include an updated existing land use map with these labels rather than amend the plan. |