Community Planning and Economic Development Planning Division Report
Small Area Plan/Comprehensive Plan Amendment

Date: January 8th, 2007

Project Name: Seward Longfellow Greenway Area Land Use and Pre-Development Study

Submitted By: CPED-Planning Division

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Neighborhood Organizations:

- Seward Neighborhood Group
- Longfellow Community Council

Current Minneapolis Plan Designations:

- Industrial/Business Park Opportunity Area -- Seward/Hiawatha
- Major Housing Site -- Midtown Greenway
- Transit Station Area -- Lake Street/Midtown
- Commercial Corridors -- East Lake

Background

The purpose of the Seward and Longfellow Greenway Area Land Use and Pre-Development Study (hereafter Seward/Longfellow Greenway Plan) was to develop policy direction for land use and development along Phase 3 of the Midtown Greenway. This study evaluated the long-term viability and appropriateness of existing land uses along the corridor, included a suggested land use plan for future uses, and explored particular development concepts for selected opportunity sites.

The study and its land use plan were prepared for project partners that included Hennepin Community Works, Seward Redesign, Seward Neighborhood Group, and Longfellow Community Council. It was funded through a grant from Hennepin County Transit & Community Works and the Local Initiatives Support Corporation (LISC). The project was guided by a steering committee and by input obtained at public workshops. The Longfellow Community Council approved the plan October 21st, 2004. The board of the Seward Neighborhood Group approved the plan on October 27th, 2004. The 45-day review period began on November 1st, 2006 and ended on December 15th, 2006.

The City's planning effort for Phases 1 and 2 of the Midtown Greenway established conventions for land use and development types. These conventions have been replicated for Phase 3 of the Midtown Greenway, informed by the Seward/Longfellow Greenway Plan. This adaptation was completed to create a consistent policy framework for the entire Greenway.

Phase 3 of the Midtown Greenway runs between Hiawatha Avenue and the Mississippi River Parkway and primarily includes a mix of both large and small scale industrial and commercial service uses. However, low-density residential uses exist nearby, and Anne Sullivan School and Bracket Park front the Greenway. Phase 3 of the Midtown Greenway is different from Phases 1 and 2 in a number of key ways:

- There is no trench. The trail is at-grade in the western portion and becomes grade separated as it rises above the surrounding area toward the river.
- Active rail service is present, associated with the few remaining rail customers along the CP Rail corridor south of Lake Street.
- Discussions surrounding a streetcar in the Midtown Greenway do not include Phase 3.
- Larger industrial parcels are more predominant. A portion of the Greenway (west of 27th Avenue) falls within the Seward/Hiawatha Employment District, as designated in the Industrial Land Use and Employment Plan, recently adopted by the City Council.
- The relationship of the corridor to surrounding streets and parcels is somewhat unique as no portion of the corridor is exactly parallel.
- Phase 3 if further from Lake Street than Phases 1 and 2, following an alignment adjacent to 27th Street rather than 29th Street.

Plan Summary

The Seward/Longfellow Greenway Plan attempts to establish a long-term transitional policy framework for a part of the city that includes Seward Industrial Park as well as areas to the east more appropriate for long-term redevelopment to residential uses. The public involvement process identified potential sites adjacent to the Greenway for detailed consideration. In addition to establishing a policy direction for these sites, site planning and development feasibility analysis were done as part of the "pre-development" component of the planning process. In each of these cases, the sites have the potential to alter the landscape and create inertia for future change. These sites include industrial uses adjacent to important neighborhood institutions that border the Greenway: Anne Sullivan School and Brackett Park.

The Seward/Longfellow Greenway Plan supports the continued base of employment in the neighborhood. With adoption of the Industrial Land Use and Employment Policy Plan, the City established firm support for industrial uses west of 27th Avenue. This is an area that is solidly industrial, contiguous, and which has traffic and circulation patterns that do not interfere with residential streets. With some notable exceptions that include truck activity at the Metro Produce site, the Seward/Longfellow Greenway Plan makes the case that land use conflicts associated with the larger industrial sites east of 27th Avenue are relatively minor. The Seward/Longfellow Greenway Plan envisions that these industrial neighbors remain, but acknowledges the long-term potential for residential redevelopment.

The plan attempts to resolve questions associated with an "Island of Residential", an industrially zoned area of low-density residential uses sandwiches between industrial uses. The plan's original maps suggest that this area become a "live-work" area. The text better describes the intent of this area, which is to support redevelopment of industrial uses to ones that include a mix of greenway-facing residential and small-scale workshop and office uses. Such a broad scenario also includes

the envisioned adaptive re-use of the Ivy Building (p. II-29), an attractive building currently home to industrial uses.

Adapted Land Use Policy Maps

The adapted land use policy maps apply a mapping convention informed by the Seward/Longfellow Greenway Plan that includes both land use and development types maps:

Key mapping tasks included:

Identifying a plan boundary

The plan boundary is similar in width to that for Phases 1 and 2 and incorporates areas specifically addressed in the study (p. I-8 and elsewhere). It is not as large as the context area considered in the plan (pp. III-10 through III-12).

Resolving alternative visions of "Live-Work" illustrated in the plan versus described in the text

The plan map indicates an area for future "Live-Work" (p. I-8). This concept embraces both adaptive re-use as well as new development along the Greenway. The plan describes the area a little differently than the map (p. II-12, 2nd paragraph). 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.

Designating land uses throughout the plan boundary

In some cases, the land use plan map in the study document provides detailed residential density information related to opportunity sites. In other cases, though discussed in the text, the map does not specifically designate future land uses.

Adapted map designations include the following:

- Development scenarios identified in the study document (pp. II-24 and II-30) are consistent with the designation of Medium-density housing (10-50 units per acre). In particular, these sites include those identified "opportunity sites" that could have a catalyst effect for future change in the corridor.

- Single-family areas not immediately adjacent to the Greenway are designated as Low-density housing (up to 15 units per acre) and include the single-family areas that are currently zoned I-1 in the "Island of Residential" west and east of 29th Avenue. Though the study document's land use map identifies these particular areas as "Live-Work" (p. I-8), home occupations remain possible and are the most appropriate use for these locations.

- Industrial uses that are part of the City's Employment Districts are designated as Light/medium industrial.

- Areas outside of the City's Employment District that are designated for future industrial activity are described as "Transitional Industrial". These are areas where there is often strong support for jobs, where there is more potential for conflicts with adjoining land uses, and where the City

does not wish to discourage continued employment uses. However, these are also areas where the City would support a transition to residential redevelopment when the market would support redevelopment.

Identifying Development District types

The Development District designations identify a range of residential building forms that may be appropriate for the area. Details and suggested building forms are included in sheets accompanying the maps. Sites were mapped as follows:

- Low-density housing areas are designated as Type I: Neighborhood Oriented, which could include single-family, row houses and small apartments.
- Opportunity sites and Transitional Industrial areas are designated as Type II: Urban Oriented, which include row houses and apartment buildings.
- The Minnehaha Mall site is designated as Type III: Transit Oriented, which may include buildings exceeding five stories.
- Areas that are part of the City's Employment District are not identified with a Development District type, as these are residential building types.

Compatibility with Comprehensive Plan

The Plan complements the comprehensive plan and other planning activities in the area. Within the study area and its environs, there are a variety of comprehensive plan designated land use features:

Industrial / Business Park Opportunity Area: Seward/Hiawatha

The Industrial Land Use and Employment Policy Plan defines the extent of the long-term Employment District. Other large industrial areas in the plan are identified in the adapted land use policy maps as "transitional". These are locations where residential redevelopment would be supported under certain conditions. Long-term policies would be to support industrial uses as long as there is market for such uses, paying particular attention to land use compatibility and site plans.

Major Housing Site: Midtown Greenway

The plan identifies areas and targeted opportunities for future housing redevelopment.

Transit Station Area: Lake Street/Midtown

The plan's adapted land use policy plan maps designate the Minnehaha Mall/Target site as high-density transit oriented development (preferred mixed-use), consistent with previous planning

Commercial Corridors: East Lake Street

Though further from the Greenway west of Hiawatha, the plan acknowledges the presence and importance of Lake Street. Consistent with the absence of intersecting commercial corridors or commercial nodes, the plan does not propose new retail commercial areas. New employment uses are envisioned as part of live/work or adaptive re-use scenarios.

Major Areas of Policy Concern and Implementation

The accompanying table includes comments from City staff regarding the plan's content as well as responses from CPED-Planning. Some of the key issues include the following, which are part of the staff recommendation:

- "Live-Work" land use designation
  The City does not have a live-work designation per se. This issue is discussed above and addressed in attached maps and table.

- Erroneous/outdated language regarding non-conforming use rights
  Clarification is made regarding the rights of owners of non-conforming uses and the procedure to request changes to and/or expansion of such uses.

- Conflicts between plan ideas and zoning standards
  In some cases, references to zoning are incorrect (e.g., Midtown Greenway Zoning Overlay District) or suggestions for development may involve conflicts with zoning requirements. Staff recommends clarifications regarding zoning. These conflicts do not compromise the spirit of the plan's recommendations.

- Extension of 34th Ave. S. across the Greenway, including a potential at-grade crossing
  Staff recommends clarification that the extension of the alignment of 34th Avenue across the Greenway is not intended for motorized vehicle use.

- Feasibility of meeting principles related to industrial development and lack of implementation mechanism toward those ends
  Staff acknowledge the challenges associated with meeting multiple objectives. Furthermore, implementation requires a variety of mechanisms that include zoning and site plan regulations/enforcement, property owner engagement, marketing strategies, and performance standards tied to public assistance.

- Vacation or extension of 27th Street
  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. 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, an idea which the community rejected.

  Staff believes that it is important to have a public right-of-way or easement along at least one side of the Greenway. Parallel access, which may or may not include motorized vehicles, supports wayfinding, access and activity associated with the Midtown Greenway. This may not always be practical given changes in grade, discontinuity of existing public right-of-way, and the fact that 27th Street and the Greenway are not parallel to one another. Any proposals for street vacations, however, should involve a larger discussion about future changes to the Greenway edge and adjacent infrastructure. Such discussions should include considerations ranging from extensions of existing streets to newly re-aligned right-of-way and/or easement dedications.

- North/south "green connector" streets
  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. Other efforts are more appropriate for identifying and implementing pedestrian/bicycle improvements. This concept could be further explored, but it should not be considered policy for these streets.

- Proposed Public Realm Features
  The Midtown Greenway Coalition is suggesting adding green spaces and a proposed Lake Street trail connection to the land use map. Alternatively, staff is recommending the creation of a Proposed Public Realm Features map based on the map of the same name for the Phase 1 and 2 Greenway Plan. This map will include the following existing and suggested new features:

  - Midtown Greenway, including access points
  - Trail connection from Midtown Greenway to Lake Street along railroad ROW
  - Brackett Park
  - Matthews Park
  - Mississippi River
  - Anne Sullivan School and grounds
  - Other public realm improvement suggestions, including references to *Conceptual Landscape Plan Midtown-Greenway Phase III (prepared for Longfellow Community Council)*

- Managing change and avoiding new land use conflicts
  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.

Future Related Actions

- **Comprehensive plan changes**. This small area plan will be an amendment to the city's comprehensive plan, and its Future Land Use map will be incorporated into the comprehensive plan's citywide Future Land Use map.

- **Rezoning study.** Zoning changes compatible with this plan's land use recommendations would be made through a future rezoning study

- **Development review.** Future development proposals for property in the Midtown Greenway Area would require Planning Commission review of development applications such as rezonings, conditional use permits, and site plan review. The Planning Commission also has a role in recommending whether proposed land sales and the establishment of redevelopment districts are in conformance with the city's comprehensive plan.

Staff Recommendation

That the Planning Commission recommends that the City Council adopt the Seward Longfellow Land Use and Pre-Development Study document as small area plan and as an articulation of and amendment to the comprehensive plan's policies, subject to review and approval by the Metropolitan Council, and subject to the creation of a companion document to be distributed with and accompany the document and which will include:

1. The adapted Land Use and Development District Maps
2. Development District and Building Type illustrations and descriptions
3. A Proposed Public Realm Features Map
4. Corrections, changes, and clarifications recommended by staff, as identified in the staff report and in the attached Table of Comments and Staff Responses.

Reference Materials / Attachments:

- Table of Comments and Staff Responses
- Adapted Land Use and Development District Maps
- Seward Longfellow Land Use and Pre-Development Study (previously distributed)
- Written Public Comments
- The official plan website:
  www.ci.minneapolis.mn.us/citywork/planning/seward-longfellow.asp

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 II-12	Land Use Plan 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. 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: "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." 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	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. 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. Zoning options could include the Residence or Office-Residence Districts or application of the ILOD for a more intensive housing/workshop concept.

			occupations in Residence Districts.		
I-8 and II-12	Land Use Plan 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? 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	CPED-Development Services	See immediately above.

			found in Section I Page 8, Section II Page 9 and Section III Page 44)		
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 11-35	Industrial to Multi-Family Residential 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	Setbacks and open	Clearly describe that building setbacks should be	CPED-	The plan suggests that site plans west of 27th

	Employment	space	reduced in Section I Page 10 Industrial Uses and Employment first bullet point: "reducing building setbacks from the street." Setbacks can also apply to parking lots, outdoor storage, etc. Removal of landscaped yards could conflict with policies of the comprehensive plan and the zoning code.	Development Services	Avenue are inefficient, reducing the potential job density in the area. The implication is to reduce unnecessary setbacks, not supercede 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 II-15	Executive Summary: Next Steps 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". 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. 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 II-21	Executive Summary: Next Steps Empire Glass (Design Workshop #1)	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 with redevelopment of the Shasta Building site and Empire Glass. Staff recommends clarification that the extension of the alignment of 34th Avenue across the Greenway is not intended for motorized vehicle use.	CPED-Community Planning (Larson)	Staff recommends that these comments be included in the companion document.
I-12 II-7 II-28 II-30	Executive Summary: Next Steps Guiding Principles for Infrastructure 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. 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. ---------- 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. 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, an idea which the community rejected. Staff believes that it is important to have a public	CPED-Development Services ---------- CPED-Community Planning (Larson)	Staff recommends that the companion document include concerns raised by Community Planning staff to the left.

			right-of-way or easement along at least one side of the Greenway. Parallel access, which may or may not include motorized vehicles, supports wayfinding, access and activity associated with the Midtown Greenway. This may not always be practical given changes in grade, discontinuity of existing public right-of-way, and the fact that 27th Street and the Greenway are not parallel to one another. Any proposals for street vacations, however, should involve a larger discussion about future changes to the Greenway edge and adjacent infrastructure. Such discussions should include considerations ranging from extensions of existing streets to newly re-aligned right-of-way and/or easement dedications.		
II-6	Vision, Principles and Strategies for Evolution 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	Buffering between	As a potential enhancement to the Guiding	CPED-	Comments are duly noted. Design guidelines

	Development and Use	industrial and residential uses	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.	Business Development (Harrington)	for specific sites and blocks can be an exercise initiated by multiple parties including the CDC or neighborhood group.
II-8 III-7	Coordination with Earlier Plans 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. 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 Multi-Family Use	Managing land use change and avoiding potential future conflicts	Although the plan, on page II-10, discusses the 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.	CPED-Business Development (Harrington)	Comprehensive plan designations and 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. 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: Bulleted list of principles	Lack of implementation mechanism to fulfill principles for new industrial	Paraphrased: 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. • "Uses adjacent to residential areas are not heavily truck-dependent. • The uses offer higher wage jobs and a higher density per acre of employment. • The uses are non-polluting. • The uses address the Greenway as a public way and a recreational amenity. • Mitigation of impacts on adjacent or nearby residential properties is mitigated on the industrial parcel. • 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 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	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

			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."		fronting business from the east.
II-13	Intensifying Industrial Uses and Employment 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 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 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.	CPED-Development Services	The "Development Concept" is one scenario to evaluate feasibility. The text makes mention of Live-Work on the Shasta Site, and 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	CPED-Development	Comments are duly noted. The development scenarios are prototypical, not prescriptive.

			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.	Services	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 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	CPED-Business Development (Harrington)	Comments are duly noted. CPED-Planning staff will request brief summary information to accompany the companion document.

			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.		
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, 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	CPED-Business Development (Harrington)	The plan encourages greater efficiency in industrial development site planning, one important objective of which is to provide potential sites for displaced uses.

			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.		
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.