

GENERAL INFORMATION

Applicant: 101 West 79th Street LLC (Owner)
Pamlico Investments (Applicant)

Location: 101 American Boulevard West

Request: 1) Conditional Use Permit for a three-story, 900-unit self-storage facility; and
2) Final Site and Building Plans for a three-story, 900-unit self-storage facility

Existing Land Use and Zoning: Manufacturing; zoned I-3, General Industrial

Surrounding Land Use and Zoning: North –Electric Substation; zoned I-3,
East – Retail; zoned I-3 and B-2,
South – Restaurant and office/warehouse; zoned B-2 and I-3
West – Auto body repair; zoned I-3

Comprehensive Plan Designation: Industrial

CHRONOLOGY

Planning Commission 01/11/2018 – Public hearing scheduled

DEADLINE FOR AGENCY ACTION

Application Date: 12/06/2017
60 Days: 02/04/2018
Extension Letter Mailed: No
120 Days: 04/05/2018
Applicable Deadline: 02/04/2018
Newspaper Notification: Confirmed – (12/28/17 Sun Current – 10 day notice)
Direct Mail Notification: Confirmed – (500 buffer – 10 day notice)

STAFF CONTACT

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PROPOSAL

Pamlico Investments requests a conditional use permit and final site and building plans to construct a three-story, 900-unit climate controlled self-storage facility at 101 American Boulevard West. The existing 27, 698 square foot office/warehouse would be demolished and replaced with a three-story, 116,805 square-foot self-storage building. The first floor has an access garage and is 40,509 square feet and floors two and three are 38,148 square feet. The proposed development would provide 12 parking stalls, eight stalls in front of the building and four stalls within an enclosed loading and unloading area adjacent to the office. A total of 19 proof of parking stalls are proposed to provide Code complying parking. The site would have one access point along American Blvd and dedicate a shared access easement for the property to the east for future redevelopment access. If constructed, this would provide an additional site access for the self-storage use. Recreational vehicle open storage is located in the rear of the site, and occupies approximately 11,639 square feet.

As the property is not a platted parcel, the applicant applied for a Type II Preliminary and Final Plat. No Planning Commission action is required on the Plat. The plat applications are a final decision by the City Council.

ANALYSIS

Self-storage facilities are allowed as a conditional use in the I-3 General Industrial Zoning District. The final site and building plan application is required to construct the proposed self-storage structure. Self-storage is a quasi-warehouse with significant transient users as opposed to this location, being on an arterial street supports the use with easy access. Self-storage facilities typically generate less traffic and disturbance than other permitted uses in industrial zoning districts, such as office, warehousing and manufacturing uses.

Code Compliance

This self-storage facility review is based on I-3 development performance standards and specific self-storage facility standards in City Code Section 19.61.01. Table 1 identifies the Code-compliance review of performance standards and Table 2 identifies the specific Code-compliance review for self-storage facilities.

City Code Section 19.61.01 establishes operational requirements for self-storage facilities. Should the self-storage facility be constructed, the applicant must observe these operational requirements on an ongoing basis.

Table 1: City Code Requirement Analysis for I-3 Zoning District

City Code Standard	Provided	Meets Standard?
Principal building setbacks (Section 19.41(c)) Front yard: 35 feet Side/rear yard adjoining a street: 35 feet Side yard: 10 feet Rear yard: 25 feet	Front yard (north): 47.3 feet Side yard (east): 26 feet Side yard (west): 48 feet Rear yard (south): 91.5 feet	Yes
Building height (Section 21.301.01(b)) No limit	3 stories/36.8 feet	Yes
Exterior building materials (Section 19.63.08(d)) - Glass, stucco, natural stone, brick, architectural concrete, metals in accordance with City policies	Brick, stone, architectural concrete, and precast concrete panels	Yes
Parking required (Section 21.301.06) 31 spaces with 9 near the office	31 parking spaces (12 provided and 19 proof)	Yes
Parking stall size (Section 21.301.06) 9 feet by 18 feet	9 feet by 18 feet	Yes
Drive aisles (Section 21.301.06) 90 degree parking: 24 feet All others, ITE with a minimum of 20 feet	24 feet 20 feet	Yes
Sidewalk (Section 21.301.04) - Sidewalk connection from the building to the public sidewalk network along American Blvd	Sidewalk connection to American Blvd is provided	Yes
Sidewalk width (Section 21.301.04) Unobstructed walkable width of five feet	5 Feet (not all unobstructed)	No – see further discussion
Trash collection area (Section 19.52) 164 sq. ft. required with indoor access	248 square feet	Yes
Trees (Section 19.52(c)) One tree per 2,500 square feet of developable landscape area – 43 trees	47 trees	Yes
Shrubs (Section 19.52(c)) - One shrub per 1,000 square feet of developable landscape area – 107 shrubs	118 shrubs	Yes
Landscape yard (Section 19.52(c)(4)) Adjacent to public streets – 20 feet Interior lot lines – 5 feet	American Blvd – 17 feet Interior lot lines – 5 feet	No – see further discussion
Screening of parking (Section 19.52(d)) Required between parking areas of 5 stalls or	Required screen between parking area and public street has been	No – see further discussion

City Code Standard	Provided	Meets Standard?
more and the public street	provided – with revisions	
Exterior lighting (Section 21.301.07) Primary entrance – 7.0 FC Parking area – 1.5 FC Sidewalk entrance – 2.0 FC	Plan submitted – Walkway requires additional lighting	No – see further discussion
Freestanding sign setback (Section 19.113(a)(3)) 20 feet from public right-of-way	3.10 foot setback	No – see further discussion

Table 2: Self-storage facility performance standards - Section 19.61.01

City Code Standard	Provided	Meets Standard?
Secure access - Access controlled by security system with gates or other devices	Two six-foot security gates securing outdoor storage area and units	Yes
On-site circulation - One-way driveways serving storage spaces must have 10-foot parking lane and 15-foot driving lane	Not applicable – no units with exterior access	Not applicable
RV open storage - 10% of land area must be dedicated to open storage – 10,744 square feet	11,639 square feet	Yes
Open storage area location and screening - Open storage area may not abut a public street and be screened in a manner consistent with materials utilized for principal building	Open storage area not abutting a public street. A six foot fence is provided to screen from other uses	Yes
Storage unit facing public street No individual storage unit entrance door shall front on any public street	No individual storage units face American Blvd.	Not applicable
Building materials Buildings must be faced with face brick, stone architectural concrete masonry units, cast-in-place or precast concrete panels, or equivalent or better	Brick, stone, architectural concrete, and precast concrete panel	Yes
Visual relief of building mass No wall facing public street or abutting property shall exceed 100 feet in length without visual relief by means of a minimum 1 foot vertical reveal	All building elevations provide multiple vertical reveals	Yes

City Code Standard	Provided	Meets Standard?
Hours of operation or on-site manager	Manager present during standard business hours – no resident manager	Yes
Landscaping along public streets Landscaping – trees, shrubs, grasses, etc. – required along all public street frontages	Landscaping provided along American Blvd – with revisions	Yes

Building Design

The proposed three story self-storage facility is 36.8 feet high and has a first floor area of 40,509 square feet. A 1,150 square foot office area is located on the first floor adjacent to the loading garage. The drive-in loading garage is located on the building front, facing American Boulevard. The proposed facility would have a maximum of 900 individual storage units, which are climate-controlled and are accessed via the loading/unloading area and adjacent elevators. The floor plans do not designate the location and size of all storage units, as the build-out will be based on demand and other factors. Staff recommends a condition establishing a maximum of 900 storage units. The architectural plans show a flat roof with a note about potential roof-top equipment. City Code requires roof-top equipment to be screened according to Section 19.52.01. Staff recommends a condition all roof-mounted equipment be screened.

Proposed primary building materials proposed would be brick, stone, architectural concrete masonry units, cast-in-place or precast concrete panels and glass. Assuming the brick is not thin brick with a grout based application, the proposed exterior materials are permitted primary materials in the I-3 zoning district and for self-storage facilities. The color would be integral to the materials and complement the surrounding development.

The City Code outlines specific building design requirements for self-storage facilities. No exterior facade facing a public street or visible to an abutting property can exceed 100 feet in length without visual relief by means of a vertical reveal. The reveal must be a minimum of one foot in depth and 10 feet in length to allow for a visual change in the wall angle. The intent of purpose of this standard is to break up the building mass. All building elevations include vertical reveals meeting the minimum requirements. The proposed building design appear to meet the City Code architectural performance standards.

Landscaping, Screening and Lighting

The site has a developable landscaping area, after required right-of-way dedication, is 107,020 square feet. As a result, the site must have 43 trees and 107 shrubs. A Code compliant number of trees and shrubs are proposed. The proposed landscaping plan shows the plants evenly dispersed around the site. However, there are a number of trees and shrubs, as well as a

raingarden, located within the front drainage/utility and sidewalk/bikeway easements. The landscaping and raingarden must be moved outside the easement area and the landscaping must be placed along the public street to comply with City Code requirements. Likewise, the full growth of the trees must not be closer than 2 feet from the sidewalk easement.

Similarly, there are a number of trees located within drainage and utility easements along the east and west property lines. The applicant proposes a storm sewer in the east easement. The storm sewer pipe should be moved into the private drive to allow the trees. Placing the trees on the private storm sewer pipe may require removal of mature trees in the future should the pipe need to be replaced. The landscaping within the easements must be approved by the Engineering Division.

Additionally, City Code requires 50 percent of the building elevation facing a public street to include foundation plantings. The proposed landscaping plan shows plantings at 46% of the building elevation with minimal plant materials. The Landscape Plan must be revised to comply with this requirement. Staff recommends a condition the landscaping plan must be revised and approved by the Planning Manager prior to the issuance of a building permit.

City Code requires the site provide a 20-foot landscape yard along a public street and five foot yards along rear and side lot lines. Driveways are allowed to encroach into the required yard area the width of the driveway at the property line. The submitted site plan shows compliant five-foot yards along the rear and side lot lines. The landscape yard along American Blvd is mostly 20 feet, although the entrance drive along American Blvd decreases the landscape yard to 17 feet. The access must be altered to provide the yard area with a radius as approved by the Traffic Engineer.

City Code requires screening in multiple locations on site. Surface parking to the north of the building must be screened from the public right-of-way (American Blvd) if the separation between the parking area and the public street is 40 feet or less. The drive aisle serving the parking is part of the parking area for this provision. Therefore the applicant must provide a three foot screen along the drive aisle as required in Section 19.52. As noted above, the landscaping along American Boulevard must be moved outside the easement area.

In regards to the outside storage area screening, the City Code requires screening for the recreational vehicle storage. The applicant proposes a 6 foot fence which must be opaque. Screening for the outdoor storage area must be provided with materials that are similar to the exterior materials used on the principal building. Staff recommends as a condition of approval that required screening be provided.

A photometric lighting plan has been submitted for review. The plan provides Code compliant light levels in most areas. However, the pedestrian crosswalk within the western circulation drive must have a minimum 3.0 foot-candles (FC) of illumination. The applicant may consider moving the sidewalk to extend directly north from the office. This would provide a shorter sidewalk and allow increase light for the sidewalk and the building entrance. Additionally, the

parking surface must have a minimum of 1.5 FC. Trees may have an effect on the light level – conflicts between lighting and landscaping must be reviewed. The primary entrance must have a minimum of 7.0 FC within 10 feet of the entrance. Staff recommends as a condition of approval that a revised lighting plan must be approved prior to issuance of a building permit.

City Code Section 21.301.07 requires all exterior lighting except for that required for security purposes be illuminated no earlier than one hour before the start of business and must be extinguished no later than after the end of business. The site could have activity after hours and plans should be reviewed and approved for the lighting required for security.

Access, Circulation, and Parking

Site access is provided from a single driveway along American Boulevard. The applicant is providing an access easement for the property to the east, should that property redevelop. This would provide a second access for the self-storage use as well. The circulation drive is restricted to a one-way to the storage area in the rear of the site. Circulation around the site is restricted by two security gates, securing the recreational vehicles open storage area along the southern boundary. The applicant must provide access as approved by the Fire Marshal.

City Code Section 21.31.06(d) establishes the required number of off-street parking spaces based on the proposed number of storage units and office size. Table 3 provides an overview for the parking required. The 900-unit self-storage facility requires 31 parking spaces. The applicant is proposing to construct 12 parking spaces and provide 19 proof of parking spaces, totaling 31 required parking spaces with nine in close proximity to the manager’s office. The total quantity, including the proof of parking spaces, meets the City Code requirement.

City Code allows for a reduction of required parking through a proof of parking process. Proof of parking is a flexibility measure used for properties that anticipate a lower parking demand than that required by Code. This process requires an agreement be executed between the property owner and the City and recorded against the property. Should a lack of parking be observed by the City, the property owner must construct the proof of parking stalls.

Figure 3: Parking Analysis for the self-storage facility

Use Description	Standard	Proposed	Required Parking (spaces)
Self-storage facility	One space per 50 storage units throughout the site and one space per 100 units near the manager’s office	900 units	27
Office	One space per 285 square feet	1,155 sq. ft.	4
Total parking requirement per City Code			31
Parking proposed			12
Proof of parking proposed			19
Total parking proposed with proof			31

Staff reviews if proof of parking is appropriate for the proposed use. Self-storage facilities historically do not generate a significant demand for parking. However, it is important to reserve area for parking should the use characteristics change or to allow future reuse of the building.

There are presently five self-storage facilities in Bloomington, one of which was reviewed by the Planning Commission in November 2017. In addition, the previous two facilities were approved for the self-storage use were granted proof of parking. Staff is not aware of any deficiencies related to insufficient parking supply at these facilities. The designated loading areas inside the building, which can accommodate four vehicles, are the most commonly used parking spaces and count toward the overall parking requirement. Staff is recommending a condition of approval that the property owner enter into a proof of parking agreement with the City.

Staff also reviewed the dimensional requirements for parking islands, spaces and drive aisles. The drive aisles and the parking space dimension comply with City Code.

Miscellaneous

The self-storage facility must have trash and recycling facilities that comply with City Code and MN State Building Code. The submitted floor plan identifies a 248 square-foot trash room inside the loading area. The proposed trash and recycling room complies with the City Code.

Regarding signage, the site is subject to the sign standards set forth in the Class IV sign district. The signage plan identifies a freestanding sign along American Boulevard that is setback less than four feet from the planned widened right-of-way line and within the sidewalk/bikeway easement. City Code requires a 20 foot setback for freestanding signs along the public right-of-way. A code complying location for a freestanding sign can be accommodated at the northwest corner of the property. Additionally, the maximum sign size area for a pylon sign is 75 square feet, whereas the submitted sign plan shows the pylon sign at 80 square feet. All signage must comply with the sign standards in Section 19.113 of the City Code.

The Civil Engineer noted the rear of the site is subject to flooding. While this is the recreational vehicle storage area and the calculated flooding is minimum, the applicant must provide stormwater rate control so no flooding in the recreational vehicle storage area would occur for the 100 year event.

Stormwater Management

Stormwater will be managed to meet the City's and Watershed District's requirements for stormwater rate control (quantity), stormwater quality and volume. The applicant is proposing to install an infiltration and storage basin in the south eastern corner of the site and along the northern property line. In addition, a raingarden is proposed in the landscape yard along American Boulevard. Rain gardens are not permitted within the drainage and utility or sidewalk/bikeway easements. These facilities must be relocated outside of the easements along American Boulevard and the side and rear yard easements. The applicant has provided a

stormwater management plan with calculations for the project. The stormwater management plan is still under review.

A maintenance plan for the stormwater management facilities must be signed by the property owner and recorded at Hennepin County. Prior to issuance of any building or grading permit, the stormwater management plan must be approved by the City Engineer. The site is located within the Nine Mile Creek Watershed District, so an additional permit will be required.

Utilities

The applicant proposed to connect to the existing 8-inch watermain under American Boulevard West with a 6-inch water service. Their 6-inch sanitary sewer service will connect to the existing 12-inch sanitary sewer under American Boulevard West. There are existing unused water and sewer services that must be properly abandoned with this project.

Traffic Analysis

No significant impacts to the traffic patterns due to the proposed self-storage facility have been identified. The property is adjacent to an arterial roadway, American Boulevard, which has adequate capacity to serve the facility. The self-storage facility is not anticipated to generate a significant volume of traffic in comparison to other industrial uses, such as an office or manufacturing use.

Transit and Transportation Demand Management (TDM)

This redevelopment will require a Tier 2 TDM plan, which allows the property owner to choose from a menu of TDM options. The owner has not yet submitted a Tier 2 TDM checklist.

Fire Preventions and Public Safety

The applicant must ensure the proposed landscaping plan does not interfere with access to and around the building. Hydrants and Knox boxes must be provided in designated locations and must be approved by the Utilities and Fire Prevention divisions. The vehicle storage area arrangement must ensure Code compliant access around the building. In addition, the gate locking system must be accessible to emergency responders and must be reviewed and approved by the Fire Marshal.

The building must be addressed plainly and visible from the street using numbers that contrast with the background. The numbers must be a minimum of four inches, be Arabic numbers and alphabet letters with a minimum stroke width of 0.5 inches. A Knox box will be required at the building entrance.

Any changes made to the current plans, including building location, access roads, and water supply and addressing shall be reviewed by the Fire Marshal to ensure continued compliance with the Fire Code.

Status of Enforcement Orders

The property is not subject to any open enforcement orders.

FINDINGS

Required Final Site and Building Plan Findings - Section 21.501.01(d) (1-4):

Required Finding	Finding Outcome/Discussion
(1) The proposed use is not in conflict with the Comprehensive Plan.	Finding Made - The subject property is guided Industrial in the Comprehensive Plan. A self-storage is allowed in the I-3 zoning district as a conditional use. The proposed use does not conflict with the Comprehensive Plan.
(2) The proposed use is not in conflict with any adopted District Plan for the area.	Finding Made - The property is not located within an area with an adopted District Plan.
(3) The proposed use is not in conflict with City Code provisions.	Finding Made - Subject to compliance with the recommended conditions of approval, the proposed use does not conflict with City Code provisions.
(4) The proposed development will not be injurious to the surrounding neighborhood or otherwise harm the public health, safety and welfare.	Finding Made - The proposed self-storage facility is consistent in use and scale with the surrounding industrial uses to the north, east and west of the subject property. The level of traffic generated by the self-storage facility is not anticipated to be more than other land uses located in industrial zoning districts. The proposed use is not anticipated to be injurious to the surrounding neighborhood or otherwise harm the public health, safety and welfare.

Required Conditional Use Permit Findings - Section 21.501.04(e) (1-5)

Required Finding	Finding Outcome/Discussion
(1) The proposed use is not in conflict with the Comprehensive Plan.	Finding Made - The subject property is guided Industrial in the Comprehensive Plan. A self-storage facility is allowed in the I-3 zoning district as a conditional use. The proposed use does not conflict with the Comprehensive Plan.
(2) The proposed use is not in conflict with any adopted District Plan for the area.	Finding Made – The property is not located within an area with an adopted District Plan.

<p>(3) The proposed use is not in conflict with City Code provisions.</p>	<p>Finding Made – Subject to compliance with the recommended conditions of approval, the proposed use does not conflict with City Code provisions.</p>
<p>(4) The proposed use will not create an excessive burden on parks, schools, streets, and other public facilities and utilities which serve or are proposed to serve the planned development.</p>	<p>Finding Made – The property is immediately adjacent to American Boulevard, a major arterial road with adequate capacity to serve traffic generated by the proposed use. The self-storage facility should not increase traffic volume sufficient enough to notice an impact on adjacent streets. Self-storage facilities generate relatively little demand on water and sanitary sewer infrastructure. The proposed use is not of a nature, scale or intensity to create an excessive burden on parks, schools, streets and other public facilities and utilities.</p>
<p>(5) The proposed use will not be injurious to the surrounding neighborhood or otherwise harm the public health, safety and welfare.</p>	<p>Finding Made – The proposed self-storage facility is consistent in use and scale with the surrounding industrial uses to the north, east and west of the subject property. The level of traffic generated by the self-storage facility is not anticipated to be more than other land uses located in industrial zoning districts. The proposed use is not anticipated to be injurious to the surrounding neighborhood or otherwise harm the public health, safety and welfare.</p>

RECOMMENDATION

Note the Planning Commission has final approval authority on this Conditional Use Permit and Final Site and Building Plans application unless an appeal to the City Council is received by 4:30 p.m. on January 23rd, 2018.

Staff recommends approval of the Conditional Use Permit and Final Site and Building Plans for the proposed self-storage facility through the following motions:

In Case PL2017-265, having been able to make the required findings, I move to adopt a resolution approving a conditional use permit for a self-storage facility at 101 American Boulevard West, subject to the conditions and Code requirements attached to the staff report.

In Case PL2017-265, having been able to make the required findings, I move to approve Final Site and Building Plans for a three-story, 900-unit self-storage facility at 101 American Boulevard West, subject to the conditions and Code requirements attached to the staff report.

RECOMMENDED CONDITIONS OF APPROVAL

Case PL2017-265

Project Description: Conditional Use Permit and Final Site and Building Plans for a three-story, 900-unit self-storage facility.

Address: 101 AMERICAN BLVD W

The following conditions of approval are arranged according to when they must be satisfied. In addition to conditions of approval, the use and improvements must also comply with all applicable local, state, and federal codes. Codes to which the applicant should pay particular attention are included below.

1. Prior to Permit A building permit for all required changes to accommodate the proposed use be obtained.
2. Prior to Permit Grading, Drainage, Utility and Erosion Control plans must be approved by the City Engineer.
3. Prior to Permit Access, circulation and parking plans must be approved by the City Engineer.
4. Prior to Permit Sewer Availability Charges (SAC) must be satisfied.
5. Prior to Permit A Minnesota Pollution Control Agency (MPCA) Sanitary Sewer Extension or Modification Permit must be obtained or notification from the MPCA that this permit is not required must be submitted to the City (State of MN).
6. Prior to Permit A Minnesota Department of Health (MDH) watermain review and approval must be obtained or notification from MDH that this permit is not required must be submitted to the City (State of MN).
7. Prior to Permit Storm Water Management Plan must be provided that demonstrates compliance with the City's Comprehensive Surface Water Management Plan. A maintenance plan must be signed by the property owners and must be filed of record with Hennepin County.
8. Prior to Permit A National Pollutant Discharge Elimination System (NPDES) construction site permit and a Storm Water Pollution Prevention Plan (SWPPP) must be provided if greater than one acre is disturbed (State of MN and Federal regulation).
9. Prior to Permit A Nine Mile Creek Watershed District permit must be obtained and a copy submitted to the Engineering Division.
10. Prior to Permit An erosion control surety must be provided (16.08(b)).
11. Prior to Permit Landscape plan must be approved by the Planning Manager and landscape surety must be filed (Sec 19.52).
12. Prior to Permit Three foot high parking lot screening must be provided along American Blvd as approved by the Planning Manager (Sec. 19.52).
13. Prior to Permit Parking lot and site security lighting plans must be revised to satisfy the requirements of Section 21.301.07 of the City Code.
14. Prior to Permit Self-storage facility exterior building materials and architectural design must be approved by the Planning Manager (Sec. 19.63.08 and 19.61.01).
15. Prior to Permit A minimum of two bicycle parking spaces must be provided and located throughout the site as approved by the City Engineer.

16. Prior to Permit All trash and recyclable materials must be stored inside the principal building with interior access. (Sec. 19.51).
17. Prior to Permit Utility plan showing location of existing and proposed water main and fire hydrant locations must be approved by the Fire Marshal and Utilities Engineer (City Code Sec. 6.20, Minnesota State Fire Code Sec. 508).
18. Prior to Permit Building must be provided with an automatic fire sprinkler system as approved by the Fire Marshal (MN Bldg. Code Sec. 903, MN Rules Chapter 1306; MN State Fire Code Sec. 903).
19. Prior to Permit Tier 2 Transportation Demand Management plan must be submitted (Sec. 21.301.09(b)(2)).
20. Prior to Permit A Proof of Parking Agreement for 19 spaces must be approved and filed with Hennepin County.
21. Prior to C/O The developer must submit electronic utility as-builts to the Public Works Department prior to the issuance of the Certificate of Occupancy.
22. Prior to C/O Prior to occupancy, life safety requirements must be reviewed and approved by the Fire Marshal.
23. Ongoing Signs must be in compliance with the requirements of Chapter 19, Article X of the City Code and Uniform Design Plan.
24. Ongoing Recreational Vehicle parking area must be reserved for recreational vehicles only.
25. Ongoing The site and building improvements are limited to those as shown on the approved plans in Case File # PL2017-265.
26. Ongoing The self-storage facility must comply with the operational requirements of Section 19.61.01(f) of the City Code.
27. Ongoing The self-storage facility is limited to 900-units unless additional parking is provided and approved by the Planning Manager.
28. Ongoing Development must comply with the Minnesota State Accessibility Code.
29. Ongoing Poured-in-place concrete curbs must be provided on the perimeter of parking lots and traffic islands (Sec 19.64).
30. Ongoing All rooftop equipment must be fully screened (Sec. 19.52.01).
31. Ongoing All loading and unloading must occur on site and off public streets.