

# EXHIBIT B



**Planning & Development Division**  
*Planning & Economic Development Department*

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A handwritten signature in blue ink, appearing to be "ADF".

To: City Council  
From: Adam Fulton, Interim Director, Planning & Economic Development  
Date: October 3, 2019  
Re: Land Conveyance and Conformance with the City's Comprehensive Plan  
Parcels 010-3430-07340, 010-3430-07350,  
010-3430-07360, & 010-3430-07370

The parcels listed above are located in the New Gary Duluth neighborhood. The City has historically owned these parcels, but has determined at this time that conveyance to an accepted applicant from the "Rebuild Duluth Program" would better suit the public purpose of adding newly constructed homes to the City's housing stock.

Section 2-176 of the City Code, Preconditions of Conveyance, requires that the City's Planning Agency "reviews proposals for conveyance for conformity to the City's comprehensive plan and shall have reported its findings in writing to the Council." The conveyance of this parcel is consistent with the adopted plans for the area, including the Official Comprehensive Land Use Map.

The properties are owned by the City of Duluth and are guided for "Mixed Use Neighborhood" in the Comprehensive Plan Future Land Use Map. This suggests the parcels are developable for housing units. The City conducted an internal review of these parcels and determined that these parcels should be used to develop newly constructed homes, noting that (a) the properties are not necessary for the city's future needs and (b) the best interests of the city will be best served by accomplishing the conveyance.

Conveyance of the properties will implement the following Comprehensive Plan Principles:

Principle # 1 – Reuse of previously developed lands, including adaptive reuse of existing building stock and historic resources, directs new investment to sites which have the potential to perform at a higher level than their current state. This strengthens neighborhoods and is preferred to a dispersed development pattern with associated alteration of natural landscapes and extensions of public services. Site preparation or building modification costs are offset by savings in existing public infrastructure such as streets and utilities, and transit, fire, and police services.

Principle # 5 – Promote reinvestment in neighborhoods. Duluth is strongly defined by its neighborhoods. This system should be supported through land use and transportation that foster neighborhood reinvestment. New development or redevelopment should maximize public investment that strengthens neighborhood commercial centers or diversifies residential opportunities that fit the neighborhood character.

Ownership of these parcels by applicants, motivated to build a new home at an affordable cost in the City of Duluth, will maximize opportunities to grow the housing stock by utilizing properties that are not necessary for the cities future needs. After reviewing the proposal, the Planning Agency finds that the proposal implements the principles of the Comprehensive Plan and is in conformance with it.