



Russ Stark
Councilmember, Ward 4
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July 16, 2012

Dear Councilmember Stark,

The Environment Committee of the Macalester-Groveland Community Council met to review the proposed Saint Paul Urban Agriculture Zoning Text Amendments and draft recommendations. The following recommendations were passed by the Environment Committee and then approved by the Board of Directors on July 12, 2012. The Macalester-Groveland Community Council supports innovative urban agriculture land uses in our district and in the City of Saint Paul as a whole. Many of the current ordinances do not take into account what is needed and what processes are involved in growing healthy food, and the proposed zoning amendments are a supportive step in that process.

After reviewing the proposed amendments, we recommend approval with the following changes:

- Clarify the definition of agriculture under Sec. 65.771., which defines Agriculture as “[u]ses that produce food or horticultural crops to be harvested, sold, or donated.” Many Macalester-Groveland families grow food in their yards and donate surplus produce to area food shelves. According to the definition used in the amendments, these personal gardens would be included and could be required to submit site plans to the Department of Safety and Inspections. We do not believe this is the intent of the definition and recommend clarification in this regard.
- Given the size of some of the potential growing sites within the City of Saint Paul, the accessory building allotment proposed under section Sec. 65.771. (j), which states that “[s]tructures shall not exceed an area greater than thirty-five (35) percent of the rear twenty-five (25) feet of the parcel,” may be too restrictive. We recommend the City adopt the metric used by other cities which is 10-15% of the total lot area (but with a higher cap than the common 1000 sq. ft.) or create a sliding scale for the total allowable sq. of accessory buildings. We believe this change will not restrict season extending capacity on larger lots.

- Reduce the distance required for planting beds from any public right of way proposed under Sec. 65.771 (l), which currently states that “[p]lanting beds shall be located four (4) feet from any public right of way.” Many families within Macalester-Groveland grow food in their front yards, along boulevards, and along their alley lines as part of our Community Council’s annual Alley Garden Awards program, which encourages residents to cultivate gardens to reduce crime. Many of these food-producing gardens are shared and enjoyed by others in the neighborhood. Residents have spoken to how much they value these gardens, which could be jeopardized by these amendments. Therefore, we recommend that this language be changed to restrict agricultural plantings near the public right of way from interfering with any public right of way or pedestrian traffic.
- Reduce the fee schedule proposed under Sec. 61.302. - Application forms and fees. We feel the fee schedule on the current amendments seems like too high of a fiscal bar for small scale growers/community gardens to reach. We recognize that growing food doesn’t generate much revenue and to put such an initial financial burden on growers seems unreasonable.
- Lastly, we recommend an independent and agriculturally experienced body to review and regulate agricultural plots within the City of Saint Paul. We feel this is crucial to avoid future conflicts as urban agriculture projects increase throughout the City. The Department of Safety & Inspections has little exposure to Good Agricultural Practices (GAPs) or up-to-date organic gardening techniques (nor should they be expected to). Organic gardening techniques evolve quickly and an independent body that would deal solely with urban agriculture would be best able to review and regulate agricultural site plans and practices throughout the City and incorporate GAPs.

Thank you for your consideration of the recommendations listed above. We encourage you to support urban agriculture within the City of Saint Paul by voting these recommendations into law. Being able to grow healthy food in Macalester-Groveland and other neighborhoods throughout the City of Saint Paul is an important step toward building a more diverse and resilient local food system.

Sincerely,



Lauren Anderson
Recycling & Environmental Coordinator

CC: Councilmember Chris Tolbert, Samantha Henningson, Nicole Wittig-Geske, Anton Jerve, Afton Martens, Joel Clemmer