



North End Neighborhood Organization (District 6)
171 Front Avenue
Saint Paul, MN 55117
651-488-4485
ed@nenostpaul.org

April 13, 2020

Bill Dermody
City Planner
Planning & Economic Development
25 W. 4th St., 14th Floor
Saint Paul, MN 55102

The North End Neighborhood Organization's Board of Directors met with you regarding the RM Zoning Study on Monday April 6, 2020. The city of Saint Paul like most urban areas are experiencing a shortage of housing. The intent of the RM2 medium density multiple family residential district is to support pedestrian and transit orientated residential development and provide for infill housing to meet a variety of housing needs.

In reviewing the proposed changes and after hearing your presentation the North End Neighborhood organization supports the modification and changes to the RM2 zoning code.

We want to thank-you for meeting remotely with us and appreciate the Planning and Economic Development department including neighborhood organizations in your process and seeking our opinion regarding changes, projects and plans

Regards:

Karin Groening
Board Chair

Cc: Ward 1
Ward 5

From: Katherine Cairns <kacairns007@gmail.com>

Sent: Thursday, April 23, 2020 11:43 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: #CI-StPaul_Ward3 <Ward3@ci.stpaul.mn.us>; #CI-StPaul_Ward7 <Ward7@ci.stpaul.mn.us>

Subject: Comments on RM Zoning Study for 5-1-20 Council hearing

Mr. Dermody-

I have reviewed the proposed amendments to Chapters 60, 63, and 66 of the Saint Paul Zoning Code and have **public health and life safety concerns** with several of the proposed amendments. I also noted that the maps at the end of the report neglect to include several large public housing properties which would appear to be covered by City Zoning. I strongly recommend that all properties owned/maintained by St Paul Public Housing also be placed on the City maps. The background document described several of these properties, but when I reviewed the maps, other large public housing units were missing from these public documents.

Chapter 60- Sec. 60.301. Zoning districts established.

I strongly oppose the removal of the "low rise" designation for RM1 and RM2 residential housing districts on the basis of life safety concerns.

RM1 low-density, **low-rise** multiple-family residential district

RM2 medium-density, **low-rise** multiple-family residential district

Rationale: Increasing the size/number of units for more St Paul properties that are classified as RM1 and RM2 (compared to the number of RM3) puts potentially more children, individuals, and disabled persons at risk in the event of fires, community-spread and airborne infectious disease outbreaks. Mitigation efforts focused on a smaller number of larger buildings allows for targeted support, improved building code enhancements for [air exchange](#), larger common hallways, fire suppression, windows that open, disability access inside the building, [disability access for parking](#) by the building, and access to affordable food/medications. The [food deserts](#) that exist in St Paul have increased since the 2017 report with the development along 1-94/University Ave. The City of St Paul also has T1- T4 zoning and housing options that should be pursued instead of the RM1 and RM2 districts. The dual purpose of increasing housing affordability and housing density is best served by new construction of larger RM3 properties rather than remodel/new construction of smaller RM1/RM2 properties that allow for disability access interiors/parking, sufficient air exchange, larger common hallways and fire suppression.

Thank you for your consideration.

Katherine Cairns

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Katherine A Cairns, MPH, MBA

1894 Summit Ave. St Paul, MN 55105

From: Bob Craft <bobcraft01@msn.com>

Sent: Monday, May 4, 2020 3:52 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: monica@wsco.org <monica@wsco.org>; michaelm@wsco.org <michaelm@wsco.org>; Derek Johnson <derekmn@gmail.com>; Hakan Miller <hokancmiller@gmail.com>; Dan Conlan <scootertramp46@gmail.com>; West Side Community Organization <leahs@wsco.org>; Karen Reid (Neighborhood Development Alliance) <kreid@nedahome.org>; gmerriam@nedahome.org <gmerriam@nedahome.org>; Noecker, Rebecca (CI-StPaul) <Rebecca.Noecker@ci.stpaul.mn.us>; Wade, Michael (CI-StPaul) <Michael.Wade@ci.stpaul.mn.us>

Subject: RM Zoning Study – Item from the Comprehensive and Neighborhood Planning Committee.

To: Bill Dermody

From: Robert Craft – WSCO District Council volunteer

Questions and concerns about the RM Zoning Study

1. What is the impact of the RM Zoning Study recommendations on existing Community Plans and previously approved zoning studies? The West Side Flats Master Plan and the recently approved Stryker Ave Zoning Study are of particular concern. Are these plans subject to revision if the new standards are approved?
2. The study offered specific examples of neighborhood impacts including one specific to the West Side on Robie Ave East. However the examples were of top down satellite photos only, not indicating what the proposed height variances or Floor Area Ratio metrics would mean for a project. How can the community evaluate them concretely with this limited information?
3. The West Side Community 10 Year Plan was recently amended to incorporate the Equitable Development Scorecard into all future development. The proposed zoning study makes no reference to this or other community standards. Was this or other District Council standards incorporated into the proposed RM Zoning Study proposal?
4. Speaking personally and not on behalf of WSCO I am concerned with the communication and review process of the RM Zoning Study. I only found out about the study when I received a response from you on April 7th about the initial notice which lacked any useful information about the study.

I listened in on the May 1st Planning Commission meeting and was surprised that only two of 17 District Councils and offered feedback. I don't believe the communication efforts or review process meets the standards of transparency required for these kind of significant changes. Personally I would recommend either holding off on the Public Comment process until there is evidence of better District Council and other stake holders involvement and possibly until the COVID 19 barriers allow for better public input.

Lastly the entire study requires some sort of masters degree in urban planning. If you truly want public input into the these processes then translate the regulation changes into something the lay person can understand. I spent some time reviewing the District 14 and 15 changes and again found them overwhelming. (but at least there were pictures).

Please consider this email public comment on the changes.

Links for my colleagues

<https://www.stpaul.gov/departments/planning-economic-development/planning/planning-commission>

<https://www.stpaul.gov/departments/planning-economic-development/planning/current-activities>

<https://www.stpaul.gov/departments/planning-economic-development/planning/west-side-flats>

<https://www.stpaul.gov/departments/planning-economic-development/planning/current-activities/stryker-avenue-zoning-study>

<https://www.stpaul.gov/sites/default/files/Media%20Root/Planning%20%26%20Economic%20Development/Dist.%2014-Dist.%2015%20Design%20Standards%20PC%2005-01-20.pdf>

Sincerely,

Bob Craft

100 King Street West

WSCO volunteer

From: Jeremy Exley <jeremy.exley@gmail.com>
Sent: Tuesday, April 7, 2020 8:04 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: RM Study Feedback

Planning Commission C/O Bill Dermody,

Comments on RM2 proposed changes.

Setbacks - Sideyard:

I would like to see more relief for side yard setbacks to allow for wider more structurally sound buildings. Especially in scenarios where there are apartments on each side of a lot. Maybe a caveat where if the adjoining properties are not residential use the side yard setback can be reduced? Some houses currently have a setback of 3-4 feet.

Setbacks overall:

I would look more to the T2 setbacks which will allow for higher density.

Max Lot Coverage:

For RM1,2 and 3 I see the max lot coverage went away, however, with front and back setbacks of 25 feet and side of 9 on a single lot the max building size is 36%, so only 1% larger than the previous maximum. Lot size of 40 x 150.

Height:

Note K (1) for Grand Ave Property limiting 40 feet in height compared to note L allowing 70 feet in height. Grand Avenue is a major artery and as such should have large high density buildings. Limiting the height to 40 feet will limit the amount of density allowed. This was a reaction to the building built at 2124 Grand Avenue in 2013 that was 5 stories. If we are now thinking of increasing the height allowance up to 70 feet with a CUP does that Grand Avenue note still make sense? Allowing bigger buildings on Grand and in other RM2 locations will help get rentals out of the more traditional neighborhood homes which will have a positive impact on the neighborhoods and values while keeping students closer to campus or on major arteries.

Is there an option to move any of the properties to T2 or spot changes any of them where development makes sense? Specifically properties that have been left out of recent developments and now are

limited in what they can do. 2132 Grand Avenue is a good example where a developer acquired the properties on either side and left a 2 story home on a single lot between a 5 story and 4 story building.

Thanks,

Jeremy Exley

Owner of 2132 Grand

From: Kristina Kliber <kkliber@comcast.net>

Sent: Thursday, April 30, 2020 10:45 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Changes To Lot Size Requirement

Saint Paul Planning Commission,

I am writing to request that you keep the 9,000 sq. ft. lot for 3+ unit developments.

Doing so will provide space on all sides of a structure for the fire department to respond to emergencies.

It will also allow for additional green space in the urban environment and provide for pollinators.

Thank you,
Kristina Kliber
2204 Dayton Avenue

Bill Dermody, City Planner

March 10, 2020

Dear Bill,

Thank you for your presentation of St. Paul's RM Zoning Study at the Macalester Groveland Community Council's (MGCC) Housing and Land Use Committee (HLU) Meeting on February 26, 2020. I'm grateful to the Comprehensive & Neighborhood Planning Committees for their work to create the density our City needs. I appreciate your invitation for citizen comments. I write as a resident of Macalester Groveland, not as a representative of any organization.

I believe that this RM Zoning Study is tainted by the statement on Page 40, "*the proposed code amendments do not address this Grand Avenue-specific footnote and would leave it in-force.*" regarding "*A footnote to the RM2 dimensional standards provides additional regulation for a 0.7-mile stretch of Grand Avenue from Fairview to Cretin that contains a lot of RM2 zoning and is near the University of St. Thomas.*"

I live at 2038 Summit Avenue. A significant segment of this "*0.7 mile stretch*" is my back yard. Our two-block alley, bounded by a liquor store and a gas station, is alive with diverse neighbors. I **know** my neighbors. I coordinate the Alley Plowing for our Prior/Cleveland stretch. A neighbor from the Fairview/Prior block does the plowing. I've driven alleys up and down Grand Avenue looking for solutions to an ice problem we had on our block. I **know** Grand Avenue, front and back. I can't help but wonder if this "*additional regulation*" comes from a few loud voices West of Cleveland who are sincere in their belief that they know what's best for our neighborhood. I feel disconcerted about what some might think differentiates us from the rest of Grand Avenue.

At the June 3, 2019 Board of Zoning Appeals (BZA) Meeting about a variance for 2150 Grand Avenue, Board Member Danielle Swift had the courage to recognize "discrimination" and "NIMBY" in the opposition to the variance. Board Member Swift did that without knowing that the neighbors on the West Summit Neighborhood Advisory Committee (WSNAC) have a "Neighborhood Stabilization Fund" to give significant sums of money to entice people, including a member of WSNAC, to "convert" student rental property by putting restrictive covenants on deeds to prevent them from renting to students. Ms. Swift wasn't present at a University of St. Thomas (UST) meeting with Student Leaders and neighbors after a racial slur incident on campus. There, a well-meaning neighbor asked a student of color, "Do you feel welcome in our neighborhood?". The Student Leader paused, "Ma'am, no student feels welcome in your neighborhood." I'm a witness to what BZA Member Swift recognized as discrimination and NIMBY. I've been nullified by, "Students aren't a protected class."

I'm entering my seventh year of service on MGCC. I represented MGCC on WSNAC for six years until I resigned October 2019. Our neighborhood's housing market will be impacted when UST's 570 new on-campus beds will be available September 2020. St. Paul's RM Zoning Study

is a timely opportunity for our community to shift from the “War Years” mentality. I invite you to ask: What truly differentiates our “0.7 mile stretch” West of Fairview from all of Grand Avenue? What criteria was used to exclude us from the zoning changes recommended for the whole City of St. Paul?

I believe St. Paul’s 2040 Comprehensive Plan is a beacon of hope for our city. The RM Zoning Study provides opportunities for change to meet our density goals. If “*This includes a lower height maximum (40’ instead of 50’), a requirement to comply with the T2 design standards, and a special minimum lot size for units with three or more bedrooms.*” is, as you said at the HLU meeting, left “*in-force*”, Macalester-Groveland is denied the opportunity to fully participate in St. Paul’s 2040 Comprehensive Plan.

I **know** that our “0.7 mile stretch” is a good place to live. I **know** my neighbors. I’m not the only one who wants all neighbors to feel welcome here. I ask the Comprehensive & Neighborhood Planning Committees to remove the “*additional regulation for a 0.7-mile stretch of Grand Avenue from Fairview to Cretin*” from the RM Zoning Study to allow Macalester-Groveland to fully participate in the St. Paul’s 2040 Comprehensive Plan.

Zoning that perpetuates discrimination: **Not In My Back Yard!**

Sincerely,

Cathy Plessner
2038 Summit Avenue
cathyplessner@me.com
651-271-6617

Hello Planning Commission,

I'd like to pass on feedback regarding the preservation of the lot setback requirements for RM zones.

I currently own 3 multifamily buildings in St. Paul, and I've had tenants ask me in the past few years if I had any smaller apartments they'd be able to move into since costs have been quickly rising.

After the 2040 plan was passed, I began exploring different options to reduce rent for individual tenants in each of these 3 buildings by adding new units so that building costs can be shared.

While most of the barriers to helping lower rent through zoning are addressed in the RM zoning student, the lot setback requirements can still make any exterior changes difficult.

I would like to see the front, back, and side yard setbacks reduced for all structures so that more housing can be provided. If this isn't feasible, I would be curious as to whether an exception could be added for stairways, porches or decks so that rather than use up valuable interior space (if even possible in the building), a stairway on the exterior can provide access to apartments. In most cases, I imagine a stairway is not going to be taking up the entire side yard of a building. Perhaps in most instances, a compact, multilevel stairway wouldn't need more than 12 or so feet in width, including landings.

Here's a more concrete suggestion for RM zones if it's helpful:

Front/Back yard setback: 10-15ft

(25ft for RM zones seems very restrictive. On many of the lots to be re-zoned to RM in the future, I imagine the setbacks will create a barrier to providing additional housing)

AND

Option 1:

Side yard setbacks: 4ft

OR

Option 2 *(if 4ft seems too close for a building):*

Side yard setback (building structure): 6ft

Side yard setback (decks, porches, stairways): 3ft

(A 3ft difference between the building and stairway setback would allow for a lot to be efficiently used should the owner wish to run a (narrow) stairway alongside their new addition. Most lot owners would probably wish for the stairway to be at least 4ft wide, however.)

Example 1: Existing building with RM2 zoning, just off the Fairview Green line station.

6 Oakley Avenue

ORANGE: Unusable space with 25ft front setback and 9ft side setback

RED: Desired future 3-story addition that could provide 1 studio apartment per floor

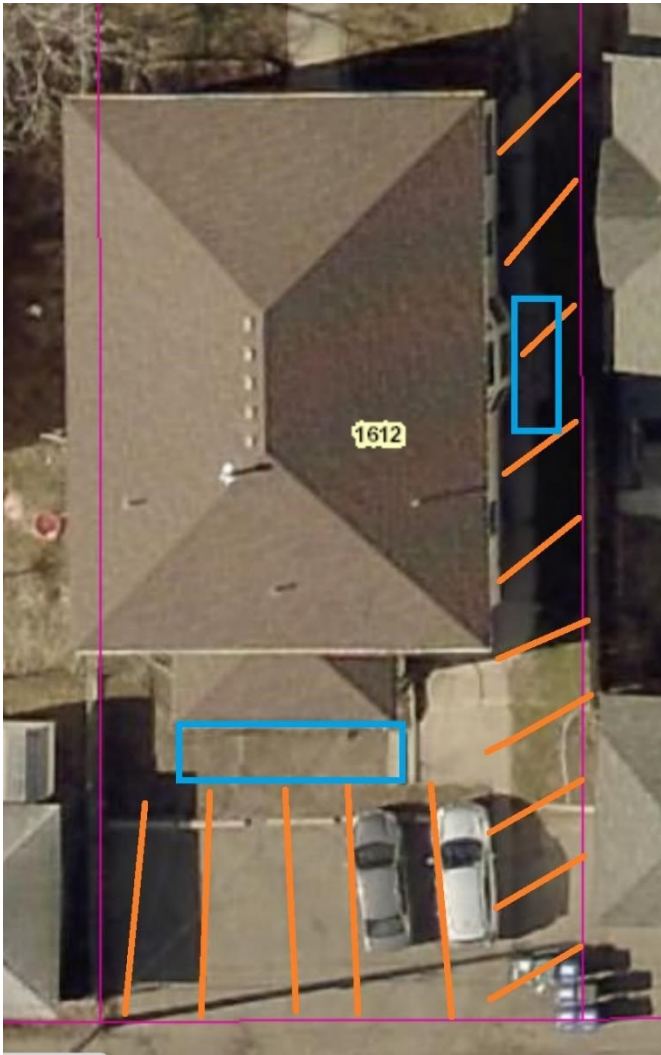
BLUE: Desired stairway to 1st, 2nd, and 3rd floor. Would need to be only 3ft wide with the existing 9ft setback (very tight). Would not allow the front (red) expansion of the same size, so probably would not expand.



I was hoping to be able to use some of my front and side yard to expand the building to provide more housing. A reduced front setback would more easily allow me to add a 2nd and 3rd floor deck off the front of the apartments that overlook Iris park directly ahead (which would be an attractive feature).

If a 9ft side yard setback remains in place, the most I could expand in the red outline is about 11ft to the side and 10ft to the front because I would need additional space in the blue area for a 6ft wide (minimum) stairway. This would mean that the addition to the building would not accommodate any additional units and not be worth the investment.

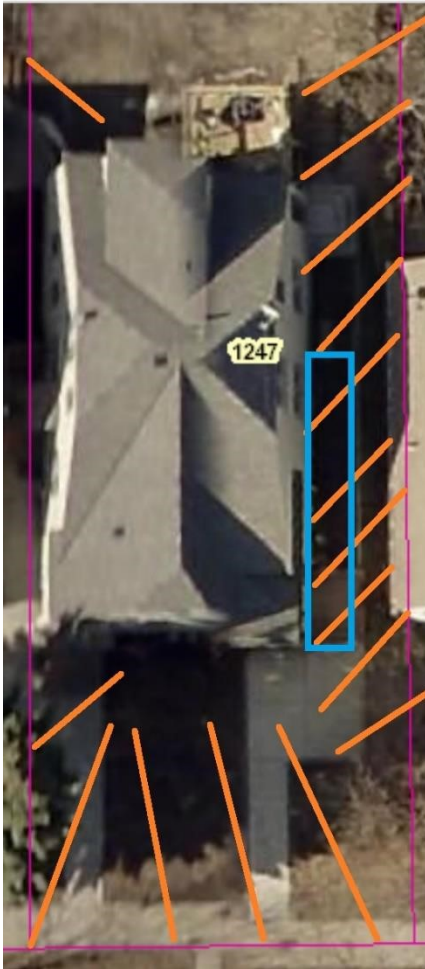
**Example 2: Existing building with R4 zoning, but anticipate (hopeful for) future RM2 zoning, as it's half a block from the A-Line stop at Minnehaha and Snelling.
1612 Van Buren Avenue**



The orange lines show how the 9ft side and rear-yard setback eliminate the possibility expansion.

The blue boxes indicate where I'd like the option of building steps/decks to the 1st and 2nd floors to accommodate additional apartments. I have no option on the side yard, and have a very tight fit on the rear and would likely need to request a variance of a few feet unless I want to try to create a crazy spiraling staircase in the space off to the right and a narrow walkway along the back, which would be ugly.

**Example 3: Existing building with R4 zoning but could be a candidate for RM1 zoning in the future with the 2040 plan.
1247/1249 Blair Avenue**



You can see that the side yard setback would not allow me to build a straight stairway to the 2nd floor. The 2nd best option would then seem to be in the front with a roof dormer addition, raising costs

This was a fairly quick write-up. Please let me know if you'd like more information, ideas, thoughts from me.

Thank you,
Dustin Schroeder
dustin.schroeder@gmail.com

838 Laurel Ave, St. Paul, MN 55104

From:	Jamie Stopestad < jamie@yardhomesmn.com >
Sent on:	Tuesday, March 3, 2020 7:35:48 PM
To:	Dermody, Bill (CI-StPaul) < bill.dermody@ci.stpaul.mn.us >
CC:	Privratsky, Matt (CI-StPaul) < Matt.Privratsky@ci.stpaul.mn.us >; Pereira, Luis (CI-StPaul) < Luis.Pereira@ci.stpaul.mn.us >
Subject:	St. Paul zoning text amendments
Attachments:	RM Zoning Study PH 4-17-20 ENS Notice.pdf (233.8 KB)

Bill,

I'm writing to share some feedback to the proposed text amendments:

1. Section 66.230. Residential District Density and Dimensional Standards.

- The building height limits in the code seem arbitrary and inappropriate based on current construction technologies and spacial standards. As you know, many buildings built before the mid 1980's had 8'4" or 8'6" finished ceilings and used dimensional lumber for floor joists. In the current era, the standard for interior finished ceiling height has increased to 9' and the industry has migrated almost entirely to (taller) web truss systems. In addition, building codes now require limiting sound transmission between floor-ceiling assemblies, which in practice have increased the depth of these assemblies. The result of these changes has not been captured in zoning codes, and I'd argue it's time for St. Paul's code to reflect this in the Building Height Maximum tables throughout. I think it's reasonable to assume a minimum of 11' floor-to-floor, or better yet 12'. This would make a 3-story structure 33 to 36' tall instead of 30' tall.

- Another reason to increase the floor-to-floor height assumptions is to facilitate the migration to off-site modular construction technologies. There is significant momentum around this shift in construction (more at www.crs Summitmn.com) and this has significant implications on building heights. Full volumetric modular units are 6-sided structural frames and these are stacked on top of each other to form a multi-story modular building. So, instead of a single combined floor-ceiling assembly modular construction results in a floor assembly and a separate ceiling assembly, and in practice adds another horizontal element to the building. If St. Paul wants to foster the adoption of off-site modular construction technologies, then a 12' floor-to-floor height is more appropriate, or again a 36' maximum height for a 3-story building.

- In my view the current height standards reduce practical building height and thus density, in contrast to the overall policy objectives under the comprehensive plan.

2. Section 66.231. Footnote (b)

- I strongly recommend against eliminating this footnote because this would have the impact of downzoning nearly every residential lot in St. Paul, since nearly every such lot adjoins an alley. I suppose the other course of action could be to increase every FAR figure and minimum lot size to compensate for

the reduced lot dimension provided by this footnote. It's hard to understate how significant this proposed change is.

- A key impact of eliminating this provision would be to drastically reduce the number of lots where ADU's are permitted. I don't think this is consistent with stated public policy or your intent.

3. Section 66.231. Footnote (l).

- This seems a proposed new standard and seems arbitrary and mis-aligned with prevailing construction technology and fire codes. The fire code sets 75' as the key height for buildings subject to high-rise code. I'd recommend you therefore use 75' instead of 70' as the relevant maximum height. Do do otherwise, again in light of prevailing construction technologies, would result in effectively one less floor on many larger apartment buildings, which does not seem aligned with the overall goals of the comprehensive plan and city policies.

4. Section 66.232. Maximum Lot Coverage.

- I would strongly recommend an increase in the maximum lot coverage to something greater than 35% for the principal buildings, and at least 50% for all buildings on a lot. The reason for this is primarily to comport with the overall density objectives under the comp plan and particularly related to ADU's. The current zoning codes imposes a number of barriers to the expansion of ADU's in St. Paul, and the current 40% total lot coverage maximum is one of the most significant barriers.

- The limits on lot coverage, especially in residential districts, places significant limitations on the ways the city can adapt to demographic change and growth. Many people I talk with are concerned about the increasing scale of multi-family structures and prefer "gentle density" by increasing the scale of dwellings more subtly and across a wider geography. I think the recent adoption of St. Paul's ADU ordinance city-wide deserves complementary changes to allow ADU's to be built in practice.

Thanks for considering this feedback. Happy to discuss further.

Jamie

https://content.govdelivery.com/attachments/STPAUL/2020/03/03/file_attachments/1391399/RM%20Zoning%20Study%20PH%204-17-20%20ENS%20Notice.pdf

Jamie Stolpestad
Partner, YardHomes MN
Jamie@YardHomesMN.com

From: Jamie Stolpestad <jamie@mn-oza.com>
Sent: Monday, May 4, 2020 10:55 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: RM Zoning Study

Bill,

Congratulations on a very comprehensive report and set of recommendations. In light of the extended public comment period, let me re-state my strong recommendation that you amend the height limits corresponding to various references to number of stories.

The current presumption that a story is equal to 10' is out-dated and not consistent with current construction technologies and customer demands for 9' finished ceilings. I think the outcome you intend could be achieved if in each place where there is a 30' maximum height for a 3-story structure you amend / adopt a 35' height. And where there is a 40' maximum height for a 4-story structure you amend / adopt a 45' height. If you were not to make such an amendment, I don't think your proposed changes will in fact achieve the desired impact.

Also, it is not clear from my reading of the proposed text changes if you are intending to change the lot coverage from the past 35% limit. The analysis section of your report indicates that this is sometimes an impediment to adding density. I think this is understated and that in fact it presents a very significant impediment to additional density. Again, to achieve the outcomes you propose, I would recommend you materially increase the lot coverage.

Finally, you propose to limit total heights to 70' under a conditional use permit. I've shared before and re-iterate my recommendation that you make this 75' to coincide with the current Minnesota fire code.

Thanks for considering.

Jamie

Jamie Stolpestad

Managing Partner

Minnesota Opportunity Zone Advisors

+1-203-585-7248

www.MN-OZA.com

From:	Robert Wales < rawales@gmail.com >
Sent on:	Friday, February 21, 2020 3:10:15 PM
To:	Dermody, Bill (CI-StPaul) < bill.dermody@ci.stpaul.mn.us >
Subject:	RM Zoning Study Comments

Good morning -

I'd like to make the following recommendations and comments on the [RM Zoning Study Code Amendments](#).

FAR versus max units

First and foremost I believe the transition to FAR would be a great benefit not only to maximize density potential but also as a standardization across our zoning codes. Removing unit maximums and transitioning to FAR would make for better land use and standards in the code.

The bonus for 3+ units should also be included as well as bonuses for RM2 common areas that would allow for variances for height maximums so that common area doesn't become a penalty to unit density (see below).

Setbacks, Maximum lot size coverage, and heights

In order to maximize land use and to bring RM more inline with T zoning standards, I'd like to see the front and rear setbacks reduced to 10ft which should also increase maximum lot coverage from the current 35%. The maximum lot coverage should be adjusted to be in line with T standards.

Especially in RM2 this would allow for increasing units.

Additionally, I would like to see the height maximum increased in RM2 specifically so that taller multi-unit (4-6) can be accommodated.

Moreover, the footnote regulating the maximum dwelling units on lots less than 9,000 sq ft should be removed. With FAR as the deciding factor, it is irrelevant and antiquated.

Thank you for your consideration of these comments.

Robert Wales
Sustain Saint Paul
1727 Race St
Saint Paul, MN 55116
612-237-0275.

MEMORANDUM

TO: St. Paul Planning Commission c/o Bill Dermody
FROM: Brian Wenger
DATE: May 3, 2020
RE: RM Zoning Regulations

Summit Hill Association (District 16) (“SHA”) submitted extensive written recommendations to the Planning Commission in advance of the May 1, 2020 Planning Commission hearing. One of the SHA recommendations was as follows:

“All of our recommendations [on RM zoning] are based on the assumption that the minimum parking requirements applicable to RM2 buildings remain in place.”

In discussions with you two days before the hearing, you indicated to SHA that you did not expect parking for RM to be addressed in conjunction with the RM zoning changes. Further, the Planning Commission gave only 1 business day after its Friday hearing to provide further written comments.

In light of the limited time to provide extra comments, I am writing to you as an individual only. If the City decides not to affirm the current parking standards in RM as part of the RM zoning revisions, then I propose that a maximum number of units (and the related parking requirements based on number of rooms) be retained in the RM zoning code. Importantly, I also am recommending an incremental increase in the number of units above the existing code.

The accompanying spreadsheet evidences the import of these recommendations. Please look at the area in orange at the bottom of the spreadsheet. It evidences that parking shortfalls can be very substantial under the City’s proposed regulations and that the shortfalls are non-existent or small under the SHA proposal (depending on the size of the units). But, even more importantly, even under the SHA proposal, there is incremental intensification of use – which is aligned with the City’s goals.

In closing, I wish to note the import of addressing parking and zoning *at the same time*. If we do not look at parking at the same time, then we are not able to see if the proposed zoning revision are practical, and even feasible. And, we are not able to see the affect of new buildings on surrounding residents and businesses. In review of your own RM zoning changes, you yourself specifically address certain modifications to the parking code. I am suggesting that we complete this integration for a better end product. I and others stand ready to assist and believe the attached spreadsheet is helpful.

April 26, 2020

Saint Paul Planning Commission
Care of Bill Dermody
25 West Fourth Street, Suite 1400
Saint Paul, Minnesota 55102

Re: Parking and Setback Requirements – Written Testimony, RM Zoning Study

Dear Commissioners and Mr. Dermody,

While largely in support of the proposed changes to the RM Zoning Districts, I urge the City to take further action to alleviate the current housing crisis. RM1 and RM2 zoning comprises 2,579 acres of valuable urban land, much of which was developed prior to current zoning controls. My concern, which I believe is a shared concern, is that neighborhoods experiencing the greatest need for affordable housing (Union Park, Macalester-Groveland, Highland Park, Summit Hill, etc.) lack the tools to develop new housing units at rent levels accessible to the working class. Current zoning regulations discourage new construction proposals that match the character and scale of traditional neighborhoods and require variances for small modifications within existing structures. **As a remedy, I ask the City to consider easing the parking requirement by 25% and side yard setbacks from 9-feet to 6-feet for all RM1 and RM2 zoned parcels less than ¼ acre (10,890 SF).** I believe both changes are consistent with T2 parking standards, T2 setback requirements, and the 2040 Comprehensive Plan.

As the City contemplates updating the RM Zoning Code, it is important to understand that minimal vehicle parking and smaller side yard setbacks match the scale of St. Paul's traditional neighborhoods. Much of the existing infill multifamily housing stock in St. Paul was built in either the early 20th century or during the construction boom from the 1960's to the early 1980's. The apartments built at the turn of the century offered formal dining rooms, built-in storage, and limited outlots since streetcars were the primary mode of transportation. The 1950's brought the advent of cheap consumer automobiles, which lead to suburban sprawl and the need to incorporate at least one parking stall for each housing unit. Much of what was built in either period is now non-conforming under current RM Zoning. It is important to realize that city planners in both eras recognized the need to develop the bulk of the land for either housing or vehicle storage—*neither generation missed the opportunity to develop the land, St. Paul's most valuable asset.*

The 2040 Comprehensive Plan aims to:

- **LU-8** Ensure that zoning and infrastructure support environmentally and economically efficient, resilient land use development, and
- **LU-14** Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes

Going forward, it is important to consider any proposed changes to the zoning code in the context of new construction and rehabilitation since both offer opportunities to expand the City's housing stock.

With regard to new construction, the majority of residential lots in the City are between 40-feet and 50-feet wide, and it is exceedingly difficult to assemble more than one parcel on the most densely zoned mixed-use corridors in

the aforementioned neighborhoods (Marshall, Selby, Grand, St. Clair, Randolph, etc.). The current and proposed side yard setback requirement for RM1 and RM2 parcels is 9', which provides only 22' to 32' of buildable width for new structures on a single lot (9' + 9' = 18' of side yard; 40' or 50' wide lot less 18' = 22' to 32' of buildable width). This remaining space is insufficient to construct more than six units after factoring egress and parking requirements. Simply reducing side yard setbacks from 9' to 6' will yield ~600 SF of living space per floor per property, which is enough to build six additional housing units on a lot that is 150' deep with 25' front yard and rear yard setbacks with a 100' long building that is five stories in height. Accordingly, it will not be feasible to add more living units through reduced side yard setbacks if density remains constrained by the current parking requirements. It is therefore prudent to reduce the parking minimums and free up land for housing production as the population's habits revert to non-car mobility modes of transportation and the need for housing exceeds the need for off-street parking.

On the other hand, rehabilitating properties may provide the best near-term opportunity to add housing units in the City given the elevated cost of new construction. As previously mentioned, neither existing parking ratios nor 9' side yard setbacks are in harmony with the general intent of the zoning code "to match the scale, character and urban design of Saint Paul's existing traditional neighborhoods." Much of the housing on the aforementioned mixed-use corridors has non-conforming setbacks, non-conforming parking loads, or both. Any time an owner of a non-conforming residential building wants to produce an additional unit by adding living space to an unfinished basement (for example), he/she will be required to submit a variance request—*thus creating unnecessary municipal due process.*

The current zoning code has major discrepancies that inhibit growth towards City's goals and objectives. The two actionables proposed herein will align the 2040 Comprehensive Plan with the existing built environment and accommodate more intense residential development. Furthermore, decreasing side yard setbacks from 9' to 6' and reducing parking minimums by 25% on RM1 and RM2 zoned parcels less than ¼ acre in size can eliminate unnecessary municipal due process when rehabilitating existing, non-conforming structures.

Your decision to amend the parking and side yard setback requirements for RM1 and RM2 lots less than ¼ acre will produce new housing units in neighborhoods that desperately need increased housing options without compromising the traditional feel of these urban-walkable communities. I hope we do not miss this opportunity.

Very cordially,



Lucas Wiborg
Founder and Owner
Shingle Creek Capital, LLC

Enclosed: Exhibit of structures with non-conforming side yard setbacks

Exhibit: Common Examples of Existing Structures Zoned RM with Non-Conforming Side Yard Setbacks

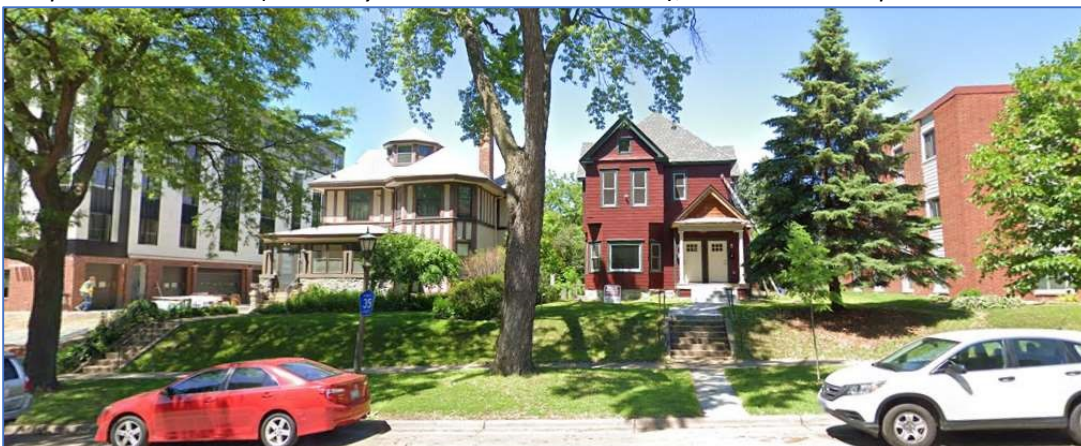
1787 Grand Ave – 18 units built in 1960 (~3' setbacks on either side)



1848 St. Clair Ave – 14 units built in 1938 (~5' side yard on west side) & 1854 St. Clair Ave – 10 units built in 1935 (~4' on east side and ~5' on west side)



1969 Marshall Ave – single family built in 1889 (3' setback on east side and 6' on west side) & 1963 Marshall Ave – duplex built in 1900 (~7' side yard setback on west side), which would require a variance to add a basement unit





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Date: April 27, 2020

To: Councilmember Rebecca Noecker
Bill Dermody
Luis M. Pereira
Emma Siegworth
Noel Nix

RE: Feedback on Proposed Changes to RM Zoning

The Summit Hill Association would like thank Bill Dermody for his previous engagement with us as we reviewed and now provide input on the proposed RM zoning.

The Summit Hill Association supports the concept of “more transit- and pedestrian-oriented residential district[s]” as the foundation of the new RM Zoning proposal. More specifically, SHA supports the City’s efforts to reduce the current and projected housing shortfalls—especially the shortage of affordable housing—through increased density, encouraging transit-supportive density (Policy LU-1), and ensuring that zoning supports environmentally and economically efficient land use (Policy LU-8). And aligned with these goals, we seek the increased density to “provide for medium-density housing that diversifies housing options ... [and be] compatible with the general scale of the Urban Neighborhoods.” (Policy LU-34).

Members of the SHA Zoning and Land Use committee, other members of the SHA Board of Directors, and additional residents of Summit Hill have attended a total of four meetings this month devoted to the topic of the proposed RM zoning changes. The comments and suggestions here come from literally hundreds of hours of discussion, consensus-building, and work among this group.

We posit that the details of *how* increased density is accomplished is truly important. As an urban neighborhood that was built mostly between 1880-1920, we understand the need for a balanced approach to increasing density. Our neighborhood is a prime example of what planners have dubbed the “Missing Middle”—one conducive to increased density in the form of primarily small buildings, along with some medium buildings. When we analyzed the proposed changes by the City, we discovered that many of the changes do not support these types of structures.

In support of increased density and balance reflected in the three policies cited above from the 2040 Comprehensive Plan and the Vision and Core Values¹ set forth therein, we make the following comments and suggestions.

¹ “Vision and Core City Values. Saint Paul is a community that is welcoming to and a place of opportunity for people of all incomes, ages, races, ethnicities and abilities. It accomplishes this by addressing the place- based dimensions of our neighborhoods: embracing growth; offering a wide range of housing choices for its diverse residents; providing a transportation system that meets



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1. **We support harmonizing the RM and T2 District design standards with regard to height only**, i.e. a standard maximum of 35ft, and moving closer to the T2 standards with regard to setbacks.

In conjunction with points 2 and 3 below, this is likely to encourage developments that better emulate the character of existing ‘missing middle’ buildings, as we have studied and observed them. This allows the RM2 standard to be used for this purpose without having to permit the broader categories of use allowed under the T2 standard.

SHA greatly values the historical significance and distinct character of the many diverse neighborhoods within the City. We support the City’s effort to “encourage a compatible mix of land uses...that reflect the scale, character and urban design of Saint Paul's existing traditional neighborhoods” (Zoning Code 60.103(1) and to provide appropriate transitions between different adjoining districts (LU-29) and adjacent property types.

2. **We propose a height limit of 35 feet (or 45 feet with a CUP) for all RM properties, and for properties 60 feet wide or less, no option to have a CUP, in keeping with the limits of the T2 guidelines.**

The height of a building is a primary driver of its perceived scale. Buildings of 3 to 3.5 stories are perceived as neighborhood-level scale, whereas buildings of 5 stories or greater feel dominant on their lots and out of step with the existing built environment, more in keeping with a principal urban center than a residential neighborhood. Conversely, many historic buildings comfortably cover up to 50% of their lots without feeling out of place, even though their total built mass (and therefore density) may be greater than a nearby modern 5 story building.

The current proposed changes call for a height limit of 50 feet (70 with a CUP) which is beyond the existing T2 standards and not consistent with the character of existing RM2 or T2 properties. (See Addenda D.2 for additional discussion.) Nor is a 50-ft height limit consistent with (a) the City Values of having RM integration into our existing Urban Neighborhoods or (b) respecting RM’s density in relation to the adjoining properties (LU-29) that are zoned most commonly as RT or R.

Additional density is more likely to gain broad community support where it is achieved by building broader, not taller. A standard maximum height of 35 ft would place the T2 and RM2 standards on an even footing, in line with the study goals. The addition of a 45ft CUP grants the flexibility to allow an additional story where the lot size and configuration of the surrounding neighborhood permits, without up-zoning to RM3. Although the 45ft CUP would be unavailable to lots less than 60ft wide, the variance process would still be an available route to allow additional height on small lots if warranted.

the needs of pedestrians, bicyclists, transit users, riders and drivers; preserving, celebrating and building on our histories; and supporting infill development that sensitively accommodates a growing, aging and increasingly diverse population.” p.16, City of St. Paul 2040 Comprehensive Plan.



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Height limits for RT districts would be adjusted from the present 40ft to match the R1-R4 limit of 30ft (RT1) and the proposed RM limit of 35ft (45 with CUP) (RT2) respectively. This would put duplexes in line with the existing height limits of the single-family homes they abut and allow townhouses to more closely match the proposed RM heights.

3. **We propose increasing the lot coverage to no more than 50%** from the present 35% limit for RM properties.

Policy LU-11 recognizes the need to “Preserve significant publicly-accessible views through the regulation of structure placement, height, bulk and scale while accounting for other priorities.” Similar to the issues of height, the RM zoning provisions as to lot coverage should contemplate how best to increase density while mitigating the impact on the character of the residential area overall and the housing surrounding the RM zoned property, which often is R4 or RT1, both of which involve much smaller structures.

Based on analysis of existing lots, we believe that retaining a maximum lot coverage of 50% (as opposed to the prior 35%) provides the appropriate balance of the multiple interests at the intersection of R4 or RT1 with RM zoned areas. (See Addenda D.3 for additional comments.)

Without a lot coverage limit, overall lot coverage is restricted primarily by fixed setbacks that do not increase with lot size. The greater coverage possible on larger lots creates a strong incentive to combine lots and create large apartment buildings that dominate their surroundings.

Increasing the lot coverage limit to 50% from the present 35% would allow for a substantial increase in density that approximates existing historical, non-conforming dense low- and mid-rise buildings that cannot be built under the current code, while ensuring that the footprint of new structures aligns with the existing character of their blocks and leaving adequate space for open and green space within the site.

As with the proposed height limits above, RT1 lot coverage would remain at 35% to match the unchanged R1-4 coverage limit, while RT2 coverage would also increase to 50% to match our proposed RM standards.

4. **We request that the East Grand Avenue Overlay District be recognized in a footnote** similar to footnote (k) of Table 66.231 - Residential District Dimensional Standards.

The intent of the Overlay District is to respect and preserve the historic scale and character of Grand Avenue. Specifically, the City codified this in Sec. 67.601 of the zoning code which states that the Overlay District is intended “to provide design standards and building height, size, and footprint limits [consistent with the historic character of the neighborhood], and to reduce the shortage of parking in the east Grand Avenue area.”



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5. **We support the elimination of Existing Footnote C, the 9,000 square foot minimum lot size for triplexes or larger (RM2)** so that it is possible to increase density on smaller lots that can support it.

6. **We propose that side setbacks should be narrowed from 9ft to 6ft for lots that are 60ft wide or less.**

Analysis of existing housing stock in Summit Hill shows that many of the existing, multi-family structures in our neighborhood which contribute to its character and allow for high density on smaller lots, have side setbacks of less than the current 9 ft requirement. (See Addenda D.4 for additional notes and examples.)

The proposed ceiling of 60ft reflects the greater impact a fixed setback has on a smaller lot, restricting e.g. a 40ft lot to a 22ft wide principal structure.

We would further suggest that this narrower setback be linked with sidewall height limit, as appears elsewhere in the zoning code.

7. **We support the change to using a variable FAR (Floor Area Ratio) that allows for more flexible building envelopes and encourages higher density development when underpinned by structured parking.**

FAR is a powerful tool that can be used to encourage additional density where it can be done in ways that benefit the residents of those blocks. We suggest the City explore a further subdivision – potentially reserving the maximum FAR of 2.5 for developments that have sufficient proximity to BRT or light rail in addition to structured parking, with a lower maximum FAR of 2.0 for structured parking alone.

We also support the conversion of BC density from using land size to FAR on the basis that, per the proposal, the 35% maximum lot coverage remains for BC zoned lots.

8. **We support keeping parking requirements in place for RM properties.**

All of our recommendations above are based on the assumption that the minimum parking requirements applicable to RM2 buildings remain in place. We recognize that parking availability plays a major role in increasing residential housing density, providing affordable housing, and in promoting the use of public transit. In a current densely populated neighborhood with limited transit options, livability includes access to parking.

Ideally and essentially, parking, transit, and RM zoning should be considered together. Since the City is proposing extensive changes to the parking codes through a separate proposal, we recommend any changes to RM parking requirements be handled in conjunction through that process. Alternatively, we recommend that the City address parking first and then RM zoning.



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SHA will be submitting separate comments to the City regarding the proposed parking changes.

9. **We support the continuation of the “alley bonus” in its new form** as it enhances the viability of many multi-unit residential projects. (See Addenda section D.6.)

We appreciate your consideration of our comments and look forward to working with you on this further.

Regards,

Monica Haas
Executive Director

Peter Rhoades
President



Addenda: Response to RM Zoning Study & Recommended Changes

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Acknowledgements

Summit Hill Association would like to thank the following people who participated in the discussion about and preparation of our response to the RM Zoning Study:

Neighbors: Marit Kucera, Brian Wenger

SHA Board Members: Ann O'Callaghan, Rene Meyer-Grimberg, Hillary Parsons

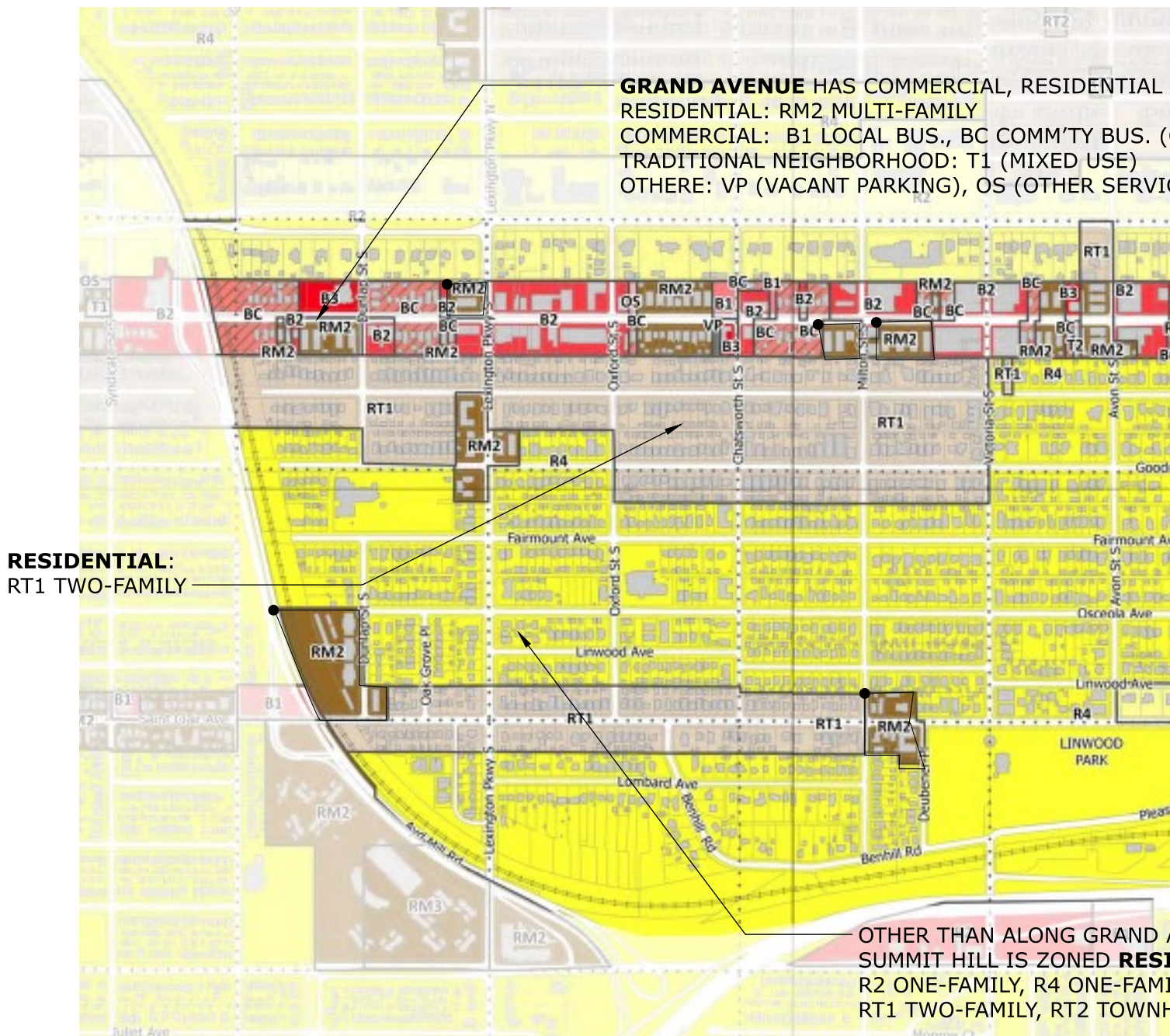
SHA Executive Director: Monica Haas

SHA ZLU Committee Members:

Sonja Mason—Who spent hours and hours analyzing and compiling data, photos, charts, and tables

Bridget Alan-Ales, Mike King, Peter Rhoades, Simon Taghioff
Denise Aldrich, *chair*

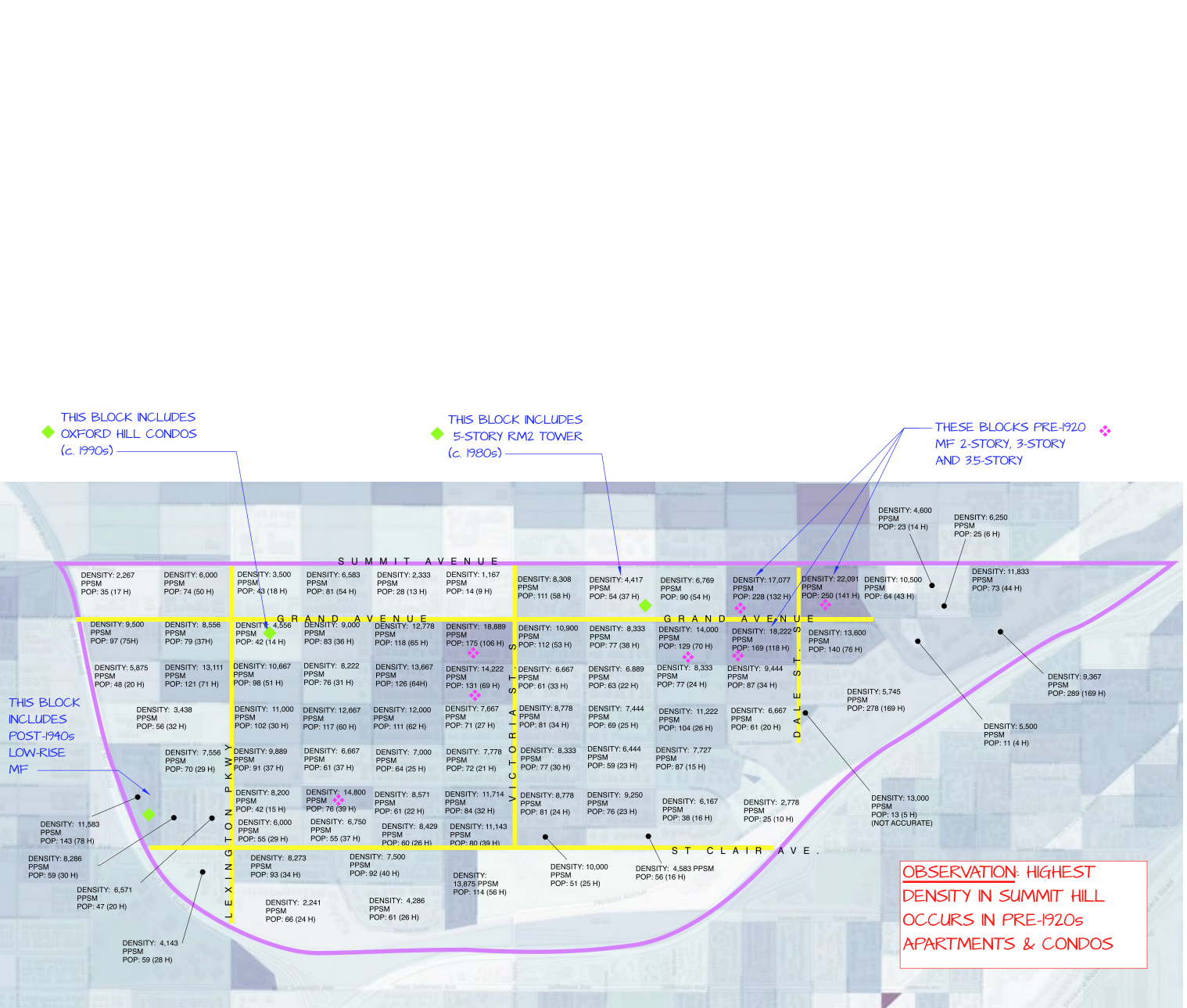
CURRENT



A PDF OF THE FULL ZONING MAP IS AVAILABLE ON THE CITY'S WEBSITE WWW. STPAUL.GOV*

<https://www.stpaul.gov/sites/default/files/Media%20Root/Safety%20%26%20Inspections/dsi.zon>

***IMPORTANT NOTE:** ZONING ORDINANCES ARE UPDATED FROM TIME TO TIME BY RE-ZONING, TEXT AMENDMENTS, AND ORDINANCES. THE OFFICIAL MAP AS FURNISHED BY THE CITY MAY NOT INCORPORATE RECENT CHANGES. 770 GRAND AVENUE WAS RE-ZONED FROM BC TO T2 IN MARCH OF 2019; ON THIS MAP IT IS LABELLED AS T2.



OBSERVATION: HIGHEST DENSITY IN SUMMIT HILL OCCURS IN PRE-1920s APARTMENTS & CONDOS

DENSITY 1,000-2,500	DENSITY 5,501-6,500	DENSITY 9,501-10,500	DENSITY 13,501-14,500
DENSITY 2,501-3,500	DENSITY 6,501-7,500	DENSITY 10,501-11,500	DENSITY 14,501-15,500
DENSITY 3,501-4,500	DENSITY 7,501 - 8,500	DENSITY 11,501 - 12,500	DENSITY 15,501 - 16,500
DENSITY 4,501-5,500	DENSITY 8,501 - 9,500	DENSITY 12,501 - 13,500	DENSITY 16,501 - 17,500
			DENSITY 17,501-18,500
			DENSITY 18,501-19,500
			DENSITY 21,501 - 22,500

DATA SOURCE:
CITY-DATA.COM
ACCESSED MARCH 6, 2020

*Based on 2000-2016 data
Displaying: blocks. Zoom out
and pan to view other areas

Read more: <https://www.city-data.com/city/St.-Paul-Minnesota.html>

ADDENDUM C

ANALYSIS OF EXISTING MULTIFAMILY IN DISTRICT 16, SUMMIT HILL

ANALYSIS: EXISTING MULTI-FAMILY IN SUMMIT HILL

Summit Hill neighborhood was built mostly between 1880-1920, and predates the first first municipal Zoning Code in St Paul (1922). Nonetheless, it exhibits traditional neighborhood organization that, while not formally planned, created a structure and planned character. The current zoning districts of Summit Hill were assigned to reflect and reinforce those early organizational ideas, codifying a mix of uses along Grand, multifamily residential uses clustered along and adjacent to arterial roads, and residential-only zoning (mostly single and two family) along the side streets. Please see large scale map in Addendum B, for visual reference.

There are several pockets of **RM2 zoning in Summit Hill**: St Clair at Ayd Mill; St Clair at Milton/Deubener. Lexington south of Grand for a couple blocks; and several sections along Grand Avenue, interspersed with B-zoning. These pockets of RM2 zoning are largely **built in a completely different form than allowed and encouraged by the current RM zoning standards**, which came out of 1970s urban planning ideas. The most dominant multi-family building types in Summit Hill are small and medium sized apartment/condominium complexes. These structures are generally brick or stone, 2-3 stories, and, in footprint, they cover beyond current setbacks as well as lot coverage and density limits. **Notably, the vast majority of these buildings are below current zoning height limits**, as well as below the lower height limits of the East Grand Avenue Overlay District. In fact, the impetus for the East Grand Avenue Overlay District was the construction of buildings that were out of scale—e.g. too tall and too massive/monolithic. The importance of building scale is underscored in Policy LU-29, **“Ensure that building massing, height, scale and design gradually transition to those permitted in adjoining districts.”**

These apartments and condominiums provide housing at a variety of price points and are an important component of housing affordability in our neighborhood. They also provide housing in different types and sizes, with different amenities, appealing to different types of households and people at different life stages. The style and historic massing are also important aspects of neighborhood. Based committee and community feedback at our five meetings, these are the qualities and aspects of the existing multifamily that are most appreciated and prized. At the same time, it needs to be acknowledged that lack of on-street parking for these residences contributes to the on-going parking problems in Summit Hill. Most have had parking added where there was room, but are below current

zoning parking minimums. While the RM Study and the Parking Study are being conducted separately, the issue of parking does greatly impact RM zoning and we encourage that the City address them together. Leaving it out of discussion about changes to RM zoning makes the study less complete.

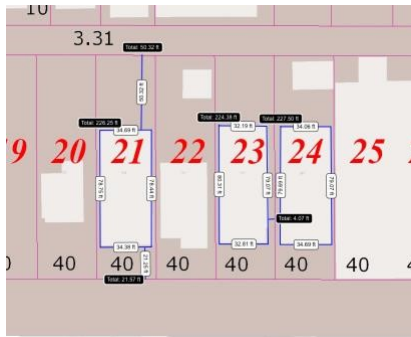
It should also be noted that Summit Hill has a number of small to medium multifamily “legally nonconforming” complexes that are not located in the pockets of RM2 zoning. The majority of the residential streets located in Summit Hill have R4 (Single Family) zoning, with as much as a quarter being zoned RT1 (Duplex). Portions of Summit Avenue are zoned RT2 (Townhouse) which allows up to 4 units per parcel, but with a lot of restrictions. There is more restrictive section of R2 (Single Family) in the southwest corner of the district. In all of these non-RM zoned areas, small multifamily complexes that predate the zoning code exist. In our assessment after detailed study, the greatest opportunity for increased housing supply in Summit Hill exists in RT1, followed by RM2 and RT2, but only if zoning standards are modified to allow development on existing (smaller) parcels.

The factor most limiting increasing density within the current zoning districts already zoned for multi-family (duplex and up) are the dimensional standards. It is also important to note that our existing higher density development occurs in buildings considerably shorter than the 50 feet currently allowed in RM2, and half the height of the 70 feet proposed to be allowed with a CUP. Please see Addendum B with a block-by-block residential density data for Summit Hill and Addendum D.4 for analysis. (Please note that this density map does not include density of commercial businesses, which is substantial along Grand Ave.)

C.1 HISTORIC MODELS OF MULTI-FAMILY

Traditional “Small Lot” Multifamily

Small Complexes, 2-3 Stories, on smaller/single lots, narrow (<9 feet) side yard setbacks. These buildings appear individually, but also sometimes in clusters of two or three. These structures are similar in scale to many of the houses in Summit Hill, though different in form. Some of these MF structures appear on “sideways lots.” The vast majority of these structures were built in the 1920s and prior.



Grand Ave Midblock 4-6 unit 2-story; surface parking behind along alley (approx. 1 per unit)
Est. FAR 0.7-0.9 Lot size 6,000 SF+1/2 Alley
Block Density: 14,000 PPM

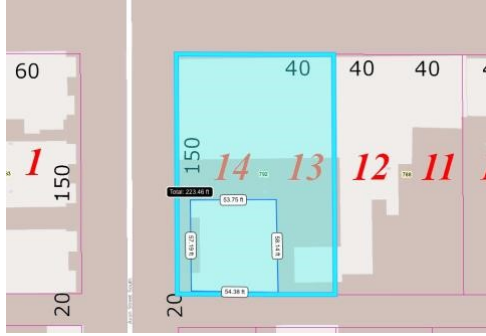
SETBACKS (est.)
Side: < 4 ft* (Does not meet fire code)
Front <12 ft
Rear > 25ft



Residential Street (Legal Non Conforming), 4-8 unit, surface parking behind along alley (approx. 0.5 per unit)
Est. FAR 0.7-1.2 Lot size 6,000 SF
Block Density 14,800 PPM



Residential Street (Legal Non Conforming), 4-8 unit, surface parking behind along alley (approx. 0.5 per unit)
Est. FAR 0.7-1.2 Lot size 6,000 SF +1/2 Alley
Block Density 13,700 PPM

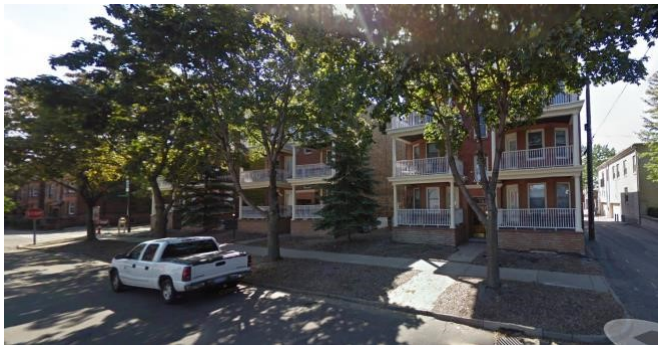


“Sideways Lot” on Side Street (Adjacent to Grand), 4-6 unit, surface & garage parking behind along alley (approx. 1.0 per unit)
 Est. FAR 0.7-1.2 Lot size 100 x 75 = 7,500 SF +1/2 Alley*
 Block Density 7,000* PPM

SETBACKS (est.)
 Side <2 st (alley), <6 ft (interior)
 Front <12 Ft
 Rear: > 25 ft
 *(Lower density compared block due to many 1-story commercial buildings)

Traditional “Street Car” Multifamily

Medium Complexes, 3-3.5 Stories, on smaller/1.5 and double lots, narrow (<9 feet) side yard setbacks. These buildings appear individually, but also in clusters of two or three. The vast majority of these structures are on Grand Avenue and adjacent sidestreets on “sideways lots.” These MF building were constructed near former street cars stops, and were built in the 1920s and prior.



“Sideways” Corner Lot” on Grand Corner, 12+ unit, surface & garage parking behind along alley (approx. 1.0 per unit)
 Est. FAR 1.5-1.8 Lot size (over several lots) 150 x 140 = 21,000 SF +1/2 Alley*
 Block Density 13,700 PPM

SETBACKS (est.)
 Side <2 st (alley), <6 ft (interior)
 Front <12 Ft
 Rear: > 25 ft
 *(Lot size based on back portion only—legally this example has been combined into one PID with the Mixed Use building on Grand)

The following three properties are located along the “Grandendale Node.” See Addendum D for more analysis related to this node in Summit Hill.



Arterial Corner (intersection of two major streets)

Lot size: 220 x 150 = 33,000 SF + ½ Alley

Foot print: 14,400 SF (+/-) (combined)

Est. Lot coverage: 44% Est. FAR: 1.3

(3-stories) Block Density 8,300 PPM

SETBACKS (est.)

Side: ~ 6 (street); 16 ft (interior), ~ 30 ft*(inbetween)

Front ~12 ft

Rear ~ 12ft

Observations

It is our assessment that these types of small and medium multifamily form a major component of the essential character of our neighborhood. We are concerned that the proposed changes to RM2 **do not permit** this scale of housing, in favor of taller, more massive complexes. **We would like RM zoning to be revised allow and encourage these smaller scale multifamily options rather than the** tall and monolithic structures that have resulted from current RM2 zoning standards, and which would continue to be allowed in the proposed RM2 zoning. We are also uncertain of how to encourage the pattern of multiple buildings that we have observed. The individual identity of separate structures is an important component of the *perceived* lower density of “Missing Middle” buildings. This model benefits residents as well as neighbors with greater access to light and air for the residents.

C.2 POST-1940 MODELS OF MULTI-FAMILY

Examples of post 1940 MF in Summit Hill



Suburban Style in-fill Multifamily (RM2): Larger Complexes, 5 Stories, on combined/multiple lots, structured parking (approx. 1.5 per unit)
Est. FAR 1.3 Lot size 21,000 SF Block Density 6,800 PPM



New New Urbanist Multifamily (B2): Larger Complexes, Mixed Use, 4 Stories, on combined/multiple lots, structured parking (approx. 1.5 per unit)



Suburban Style in-fill Multifamily: (RM2) Larger Complexes, 2.5 Stories, on combined/multiple lots, garages + surface parking (approx. 2 per unit)



3-story, 6-unit Structured Parking. Single lot. (apprx 2.0 per unit) Est. FAR 1.5 Lot size 9,000 SF Block Density 9,500 PPM* *before construction



3-story condo, 6-8 units, on combined multiple lots. structured parking, (approx. 1.5 per unit)



4-plex (RT2) structured parking (approx. 2 per unit)



Townhouse (RT2). garage parking 2 per unit



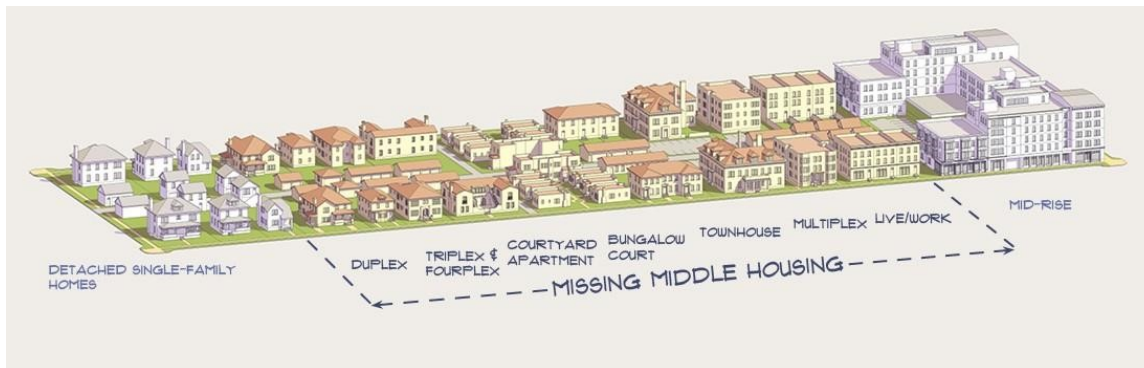
Townhouse (RT2). 2.0 story, single lot, detached garage parking 2.0 per unit unit (*this is technically in Summit-U*)

C.3 DENSITY, CHARACTER, AND THE “MISSING MIDDLE”

The historic 1920s (and earlier) multiple family housing are part of the existing character of Summit Hill and increase the variety of housing options in our neighborhood. Key features of these are heights at 2- and 3-stories, and are often located on single parcels or two combined parcels. Buildings are sometimes clustered, but the buildings themselves are distinct, disconnected buildings with separate entrances and yards in between. This maintains the **rhythm of the street**, and **allows access to light and air** as well as **individual identity** to each structure. Much of this housing type is located along Grand and adjacent side streets, as well as along Lexington and St Clair, but there are also many examples of multifamily apartments on residential side streets.

The type and scale of multi-family housing seen in these historic models are what planners have come to call “[the Missing Middle](#).” Some key features of the missing middle include:

- small-footprint buildings
- walkable context
- lower perceived density
- smaller well-designed units
- simple construction
- creates community
- marketability
- historic character



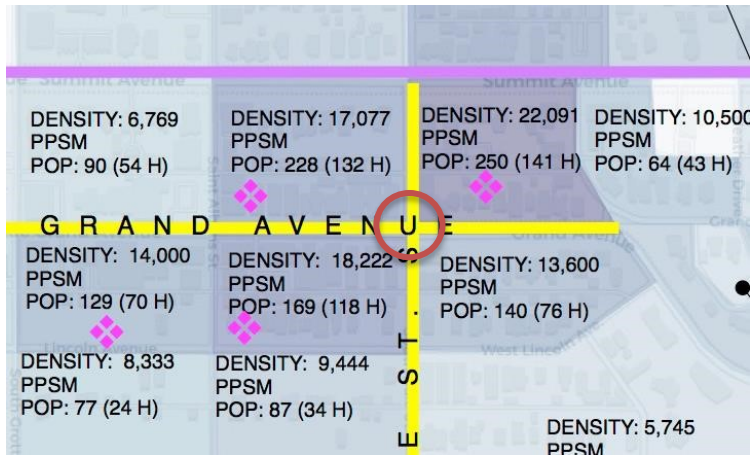
Post-war multifamily construction has several models. The models that fit best with the rhythm and character of the neighborhood are those in keeping with existing scale. Under three stories, individual identity with multiple doors to the street.

Notably, the older pattern for residential density has created greater density than the newer, more monolithic MF models. The block with the greatest residential density in Summit Hill (22,091 people per square mile) is bounded by Dale, Grand, St Albans, and Summit. This has block features several older multifamily 3-story buildings, as well as MF conversions (“converted mansions”). Indeed, all the blocks with residential density above 14,000 are blocks with older “missing middle” multifamily structures. Newer larger and

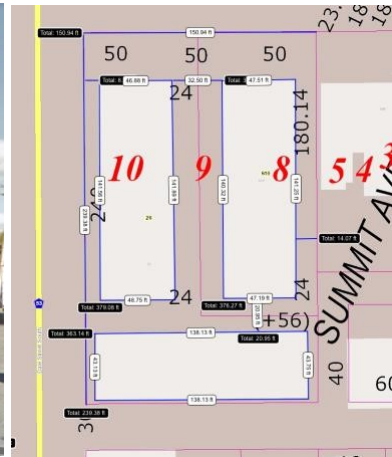
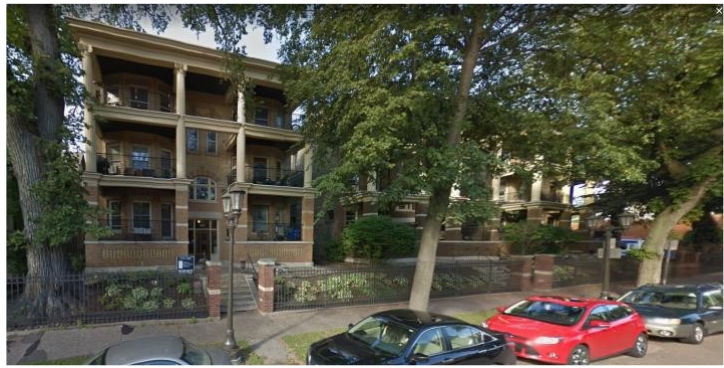
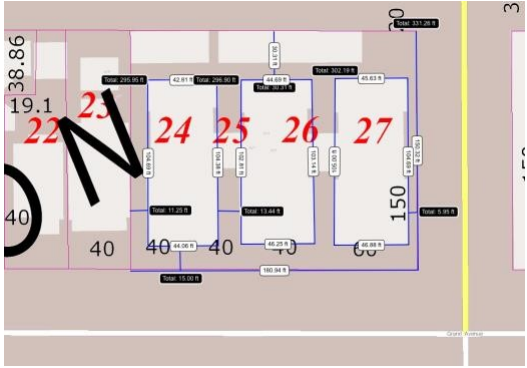
taller projects have not resulted in anywhere near the residential density of historic models. The 5-story tower on Grand and mixed-use Oxford Hill are located on blocks with under 7,000 and 5,000 PPSM residential densities, respectively.

C.4 HISTORIC MODELS OF RESIDENTIAL DENISTRY: GRANDENDALE NODE

Summit Hill's Highest Residential Density block is not a block, but rather a node, located at the corner of Grand Avenue and Dale Street. There is a wide variety of housing types: multifamily complexes of 3 or 3-1/2 stories, converted mansion multi-family, mixed use, townhouses as well as 4-plex, triplex and duplexes.



* RAMSEY COUNTY DOES NOT PROVIDE UNIT DATA ON CONDOMINIUMS OR MIXED USE PROPERTIES. WHERE KNOWN, THE NUMBER OF UNITS HAS BEEN ADDED MANUALLY TO THE RAMSEY COUNTY MAP.



ADDENDUM D

SPECIFIC GOALS AND RECOMMENDATIONS TO THE PROPOSED CHANGES TO RM ZONING

OVERVIEW: EXPANDING MULTI-FAMILY IN SUMMIT HILL

We would like to see the changes to R-zoning that would allow new construction that more closely matches traditional MF construction, rather than the suburban style complexes. In particular, related to the “**missing middle**” of small multi-family, Summit Hill currently has a lot of housing options in the “missing middle;” but among the “newer” RM2 projects (post-1940) that model largely does not exist.

The proposed changes to RM express a desire to promote more “missing middle,” but as written do not appear likely to actually accomplish this goal.

Triplex and 4-unit buildings are allowed in RT2 (Townhouse). Changes to RT1 (Duplex) and RT2 (Townhouse) would help increase housing supply in an incremental way. An incremental approach is especially useful in pre-WWII neighborhoods like Summit Hill for the following three reasons. One, incremental increases will have a smaller effect on already dense neighborhoods, requiring less mitigation. Second, established neighborhood rarely have large sites available for larger developments; there is more opportunity for smaller infill projects on smaller lots. Three, smaller projects (and particularly shorter building heights) can preserve and enhance the existing character of these neighborhoods.

D. 1 SPECIFIC COMMENTS OF SUPPORT: MAKE RM2 MORE LIKE T2

Summit Hill Association supports changing to a FAR standard for density and lot coverage, but only in conjunction with making the RM districts more like T districts with regard to height.

Most specifically, we are concerned that the height limits of RM2 are not proposed to be lowered to match T2. The proposed switch to FAR standard increases the allowable lot coverage and effectively raises the height limit to 70 feet with a CUP.

The 1975 intent of RM2 was to allow taller buildings but to increase setbacks to decrease the affect on neighboring properties. In fact, until 2015, the code had side setback that were “half height” rather than 9 feet.

D.2 SPECIFIC SUGGESTIONS: LOWER MAX HEIGHT IN ALL RM PROPERTIES

As noted in the letter, we suggest lowering the height maximum for all RM properties. For context, buildings being “too tall” is frequently cited in community feedback. It was opposition to the 50ft height limit of a new development that led to the 2018 West Zoning Study. In the Jan. 25, 2018 Memorandum “re: West Marshall Avenue Zoning Study,” page 2 notes *“While there seemed to be general support... for the type of medium density residential development allowed under the existing zoning, there was agreement that the height (five stories or 50 feet) and scale of development potentially allowed under existing RM2 zoning is not consistent with the character of surrounding development.... **Most felt three stories allows for increased density and is appropriate but that four and five stories is just too tall to be in character with existing neighborhood development.**”* [emphasis added] Similarly, the East Grand Avenue Overlay District and the existing Table [66.231](#) special footnote (k) Residential District Dimensional Standards for western Grand Avenue near Finn (near UST campus) also create lower height limit heights to improve compatibility with the surrounding neighborhood.

Careful analysis of the residential density maps of District 16 from citydata.com (Addendum B) illustrate that height is not necessarily the key indicator or driver of density. The blocks with the most residential density in D16 occur in areas with buildings less than 4 stories (and with small side-yard setbacks). (Additional discussion previously in Addendum C.4.)



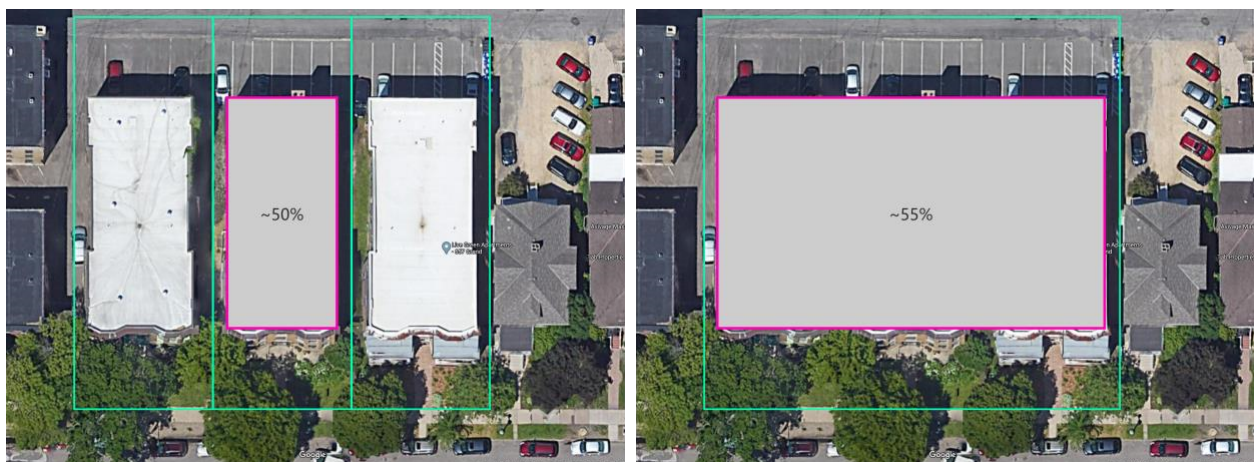
D.3 SPECIFIC SUGGESTIONS: CHANGES TO MAX LOT COVERAGE

Page 38 of the City’s RM Zoning Study proposes eliminating the lot coverage maximum in RM and RT 1 and RT2 areas. While we support the goal of allowing increased lot coverage, we do not support an elimination of this standard but propose an intermediary option namely, a lot coverage limit of 50% in RM and RT-1 areas and keeping the 35% coverage limit in RT2.

Members of this group took great pains to study what difference the FAR standards would have on lot coverage (versus the existing system) in a wide variety of property types in District 16 using a spreadsheet that calculates max lot coverage under FAR vs existing limits for different sized lots. In smaller lots (60ft or less), like those common in D16, side setbacks are usually the limiting factor in establishing a building footprint.

As discussed in Addendum C above, many of the older buildings in D16 occupy more than 35% of their lots and yet we consider them an important and **desireable** building type. As discussed above, it is the overall height of a building that is more often perceived as being out of character with surrounding structures.

Therefore, even though we support using FAR as a standard, we believe a max lot coverage standards also needs to be in place. For smaller lots (e.g. 60ft or less), it is difficult to achieve a 2.0 or higher FAR regardless of structured parking or size of the building footprint. However, at larger lot sizes (for example if several adjacent lots were to be developed together), it becomes possible to build a large monolithic building that would be out of scale with the surroundings but not necessarily provide increased residential density.



	A	B	C	D	E	G	H	I	J	L	M	N	O
23													
24		Existing Standards				Proposed							
25		Single Lots		Double Lots		Single Lots		Double Lots					
26	Common Lots	40ft	60ft	80ft	120ft	40ft	60ft	80ft	120ft				
27													
28	Width	40	60	80	120								
29	Depth (with alley bonus)	160	160	160	160	(<- use figures from the left four columns)							
30	Area (sq ft)	6,400	9,600	12,800	19,200								
31													
32	Max coverage at setbacks	2,420	4,620	6,820	11,220	3,080	5,280	7,480	11,880				
33	Max coverage (%)	38%	48%	53%	58%	48%	55%	58%	62%				
34	Adjusted max per code	35%	35%	35%	35%	48%	50%	50%	50%				
35	Adjusted max (sq ft)	2,240	3,360	4,480	6,720	3,080	4,800	6,400	9,600				
36													
37	RM1	(Current)				(New - Surface Parking)				(New - Structured Parking)			
38	(Lot Width)	40	60	80	120	40	60	80	120	40	60	80	120
39													
40	Max Sq Ft. (FAR)					3,840	5,760	7,680	11,520	6,400	9,600	12,800	19,200
41	Min Stories to hit FAR					1.25	1.20	1.20	1.20	2.08	2.00	2.00	2.00
42	Actual buildable stories	3	3	3	3	1.25	1.20	1.20	1.20	2.08	2.00	2.00	2.00
43													
44	Max Built Sq. Ft.	6,720	10,080	13,440	20,160	3,840	5,760	7,680	11,520	6,400	9,600	12,800	19,200
45	Effective Max FAR	1.05	1.05	1.05	1.05	0.6	0.6	0.6	0.6	1	1	1	1
46	Max Units	2	5	6	10	3.8	5.8	7.7	11.5	6.4	9.6	12.8	19.2
47	Min unit size at max	3,360	2,100	2,100	2,100								
48													
49	RM2	(Current)				(New - Surface Parking)				(New - Structured Parking)			
50	(Lot Width)	40	60	80	120	40	60	80	120	40	60	80	120
51													
52	Max Sq Ft. (FAR)	N/A	N/A	N/A	N/A	9,600	14,400	19,200	28,800	16,000	24,000	32,000	48,000
53	Min Stories to hit FAR	N/A	N/A	N/A	N/A	3.12	3.00	3.00	3.00	5.19	5.00	5.00	5.00
54	Buildable per code	5	5	5	5	3.12	3.00	3.00	3.00	4.00	4.00	4.00	4.00
55													
56	Max Built Sq. Ft.	11,200	16,800	22,400	33,600	9,600	14,400	19,200	28,800	12,320	19,200	25,600	38,400
57	Effective Max FAR	1.75	1.75	1.75	1.75	1.50	1.50	1.50	1.50	1.93	2.00	2.00	2.00
58	Max Units	2	6	9	13	9.6	14.4	19.2	28.8	12.3	19.2	25.6	38.4
59	Min unit size at max	5,600	2,625	2,625	2,625								
60													
61	Max units with structured	2	10	14	21								
62	Min unit size at max	5,600	1,680	1,600	1,600								

The full spreadsheet (which allows the user to change any value in a green cell) is available here:

https://drive.google.com/file/d/1QC1obBN4sR4uYjefDMxPH1a096VFL_Kl/view?ts=5ea4b178

D.4 SPECIFIC SUGGESTIONS: CHANGES TO SIDE YARD SETBACKS

Smaller side yard setback for lots 60 feet wide or less: Historical precedents of “missing middle” apartments generally have setbacks less than 9 feet. Smaller side yard setbacks for 2-story would allow the construction of similarly scaled small multifamily housing on smaller lots.

Rationale: The existing nine foot setbacks would result in eighteen feet between buildings, this is considerably more than other areas of building and zoning code. For example, a five foot side yard would meet IBC minimum of ten feet between buildings. A six foot setback would meet the zoning code provision (footnote (i) to Table 65.221) for twelve feet between houses and townhouses on the same parcel. To increase drainage and decrease impervious surface, we support the second standard on smaller lots — a minimum of twelve feet between buildings, which would be achieved with a minimum 6 feet setback for side yards (R3 standard).

D.5 SPECIFIC COMMENTS OF SUPPORT: ELIMINATION OF THE 9,000 SF FOOTNOTE

Summit Hill Association supports the elimination of Existing Footnote (c), “No multiple-family dwelling shall be built, nor shall additional dwelling units be added to an existing building to create three (3) or more dwelling units, on a lot that is less than nine thousand (9,000) square feet in area.”

Allowing the conversion of large houses to duplex or triplexes is a viable way to increase density in an incremental manner, and increase the economic viability of existing structures. The 9,000 SF is arbitrary and creates an undue burden on development and expansion.

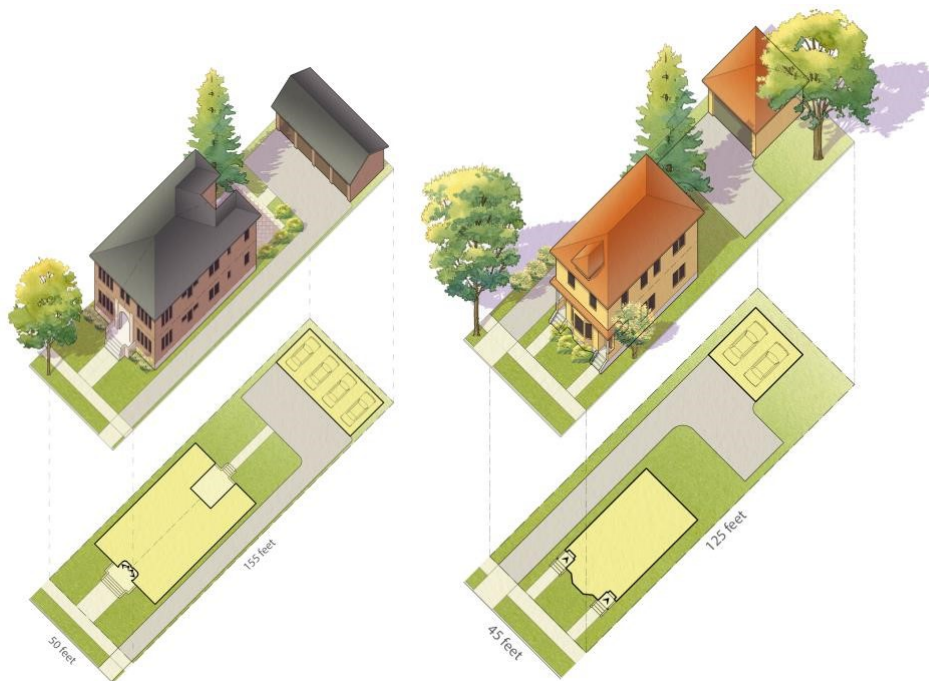


IMAGE SOURCE: <https://missingmiddlehousing.com/types/fourplex#idealized>

Furthermore, smaller buildings are less likely to require expensive systems such as elevators and sprinklers. Increasing the number of lots in which triplexes are permitted should allow more economical development of properties with increased density and more variety of housing types.

D.6 SPECIFIC COMMENT OF OPPOSITION: ELIMINATION OF THE ALLEY FOOTNOTE

Summit Hill Association opposes the elimination of Existing Footnote (b), “In calculating the area of a lot that adjoins a dedicated public alley, for the purpose of applying lot area and density requirements, one-half the width of such alley adjoining the lot shall be considered as part of the lot.”

The intended purpose of eliminating this footnote is to decrease redundancy, *since the “alley bonus” is elsewhere in the zoning code, and its appearance in Table 66 is redundant. We would like to underscore our support for the “alley bonus.” Retaining it as a footnote, while redundant, increases the awareness of accessibility of this information. In a document as complex and dense as the zoning code, we feel that redundancy is less of a problem than not being able to locate information. Therefore, we suggest leaving the alley footnote in this section.*

*The alley bonus is important. Without it, the result would be to essentially “shrink” existing lots with alleys (for zoning purposes). For example, for a typical 40 foot lot with a typical 20 foot alley, the reduction (from current zoning) would be 400 SF. Approximately two-thirds of properties in St Paul have alleys, **the elimination of this provision will decrease density and decrease lot coverage, compared to what is allowed presently; and result in an increase in variance applications.***

The existence of alleys allows access to the rear of a lot without a driveway, effectively allowing lots to be narrower.

The dominant pattern of land use in Summit Hill has narrow deep lots oriented north-and-south along east-west residential avenues. However, there is a repeated compliment to this dominant pattern. **“Sideways” lots occur frequently throughout Summit Hill:** smaller east-west oriented parcels along the side streets. These lots are often smaller than 5,000 SF, or have higher per-square-foot density. Including the alley to these side lots can add 20-25% to the lot size, since the long edge of the lot parallels the alley. Moreover, the Sideways lots compliment what are often larger homes on streets like Lincoln or Summit, with smaller Single-Family and Duplex as well as with “missing middle” multifamily. These Sideways lots are one of the key early urban planning features that increases the diversity of housing types in our neighborhood. We are opposed to lowering their existing lot size by eliminating the Alley Provision.

EXAMPLES OF "SIDEWAYS" LOTS



"Sideways" Townhouse



"Sideways" Duplex



"Sideway" Single Family Lot



"Sideways" Multifamily

ADDENDUM E

OVERVIEW OF PUBLIC TRANSIT AND TRANSPORTATION IN SUMMIT HILL

Summit Hill has moderate transit service. Four bus routes serve Summit Hill: three “Frequent Local Buses” (63, 65, 83) and one “Rush Hour Bus” (70). There are no “High Frequency” routes (service every 15 minutes or better) in Summit Hill. The main transit option for Summit Hill residents is the 63 Bus that runs along Grand Avenue. This bus connects Grand to downtown St Paul and eastward, but lacks a direct Minneapolis connection. North-South transit lines that serve Summit Hill include the 83 on Lexington and the 65 (northbound only) on Dale Street from Grand Avenue. These routes offer connection to the Green Line light rail. The 70 runs along St Clair during rush hour, to offers connection to downtown St Paul as well as to St Paul’s Highland Park neighborhood in the west, but lacks a direct Minneapolis connection.

Summit Hill has good walkability from housing to businesses along Grand Avenue. New technology car sharing (HourCar, Car2Go) and bike sharing have been tried in St Paul, but have discontinued. Summit Avenue is an important bike route.

Nonetheless, most Summit Hill residents, employees, and business customers rely on cars as their main mode of transportation.

Parking has been an ongoing source of conflict between institutions (Hamline Mitchell, Women’s Club, University Club, and churches), retail and business along and adjacent to Grand, as well as residents who lack off-street parking. Area 9 Residential Permit Parking has one of the highest utilization of any of the RPPs.