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To: Saint Paul City Council Contact-Council@ci.stpaul.mn.us

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RE: RM Zoning

In response to the Draft RM Zoning Study, The D16 District Council / Summit Hill Association conducted a detailed analysis and hours of community meetings before submitting detailed feedback in the form of a letter and addendum.

The neighborhood is almost evenly split between homeowners and renters (48.6% owner-occupied, 45.4% renter-occupied). Multi-family housing is prevalent throughout the neighborhood. It ranges from converted duplexes and infill developments on small lots to groups of larger buildings spread across multiple city lots.

D16 / SHA identified **two basic models** for infill multi-family housing:

- low and mid-rise buildings that achieve density by covering 50% of the lot or more (e.g. the pre-1945 'streetcar' buildings); and
- high rise tower blocks surrounded by asphalt parking lots that arose out of 1970s urban planning ideals.

As a result of its analysis, D16 / SHA concluded that **using expanded lot coverage to add density instead of height** would allow the City to meet its density goals in a way that would (a) accommodate other Draft 2040 Plan policies and (b) be more acceptable to existing neighborhoods than building more tower blocks.

Amongst other things, D16 / SHA proposed reduced setbacks, increased maximum lot coverage, and maximum heights of 35ft by right (45ft with a conditional use permit). As a package, this created an incentive for developers to create additional density by covering more of the lot instead of building more stories.

The original study recommendation included this provision. The CNPC adopted the parts of the study recommendation that allowed for greater lot coverage AND also increased height limits to allow for tall buildings by right. The amendments still make it *possible* to build wider, deeper buildings instead of tall ones, but remove any incentive to actually do so. Developers will likely continue to propose tall, monolithic buildings and use the remainder of the lot for cheap surface parking.

We therefore ask that the original study recommendation – 35ft height limits for RM1-RM2, with a Conditional Use Permit available to allow up to 45ft – be restored.

Reverting the proposed height limits to the original study recommendation that was presented to the CNPC would provide the following benefits over the amended CNPC version that is before the City Council:

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Encourages 'missing middle' housing instead of more tower blocks

Channeling additional density into lot coverage instead of height encourages 'missing middle' housing, which is specifically mentioned in the City's 2040 plan.

Missing middle housing can provide **greater density** than tall tower blocks, while promoting walkable, transit-supportive neighborhoods instead of car-centric towers surrounded by asphalt parking lots.

Missing middle housing is also key to **increasing affordability**, opening up a range of smaller lots and making them viable for infill development projects, thereby increasing the overall supply and choice of available multi-family housing units.

Aligns the proposed RM standards with our existing T standards

An express goal of the RM study was to align the RM standards with the existing T district code, so that RM districts could enjoy the benefits of T zoning without having to permit the additional uses available in T districts.

The zoning code for T districts specifies a base height of 35ft, with 45ft available in T2 with a CUP. Reverting to the original study recommendation would align the proposed RM standards 1:1 with the existing T standards.

Builds community support for increased density

Height is the primary driver of perceived scale, and most additional density in Saint Paul by 2040 will come from infill housing within existing neighborhoods. Buildings at 35ft (3 to 3.5 stories) are perceived as at neighborhood scale and sensitive to adjacent uses (typically R1-RT2) at 1-2 stories, whereas buildings at 70ft (with CUP) are not.

Increasing density is more likely to gain broad community support where it is achieved by building broader and deeper, not taller.

Meets density goals

Previously, the only way to add density was to add height. The study proposals eliminate density maximums, reduce both side and rear setbacks, and remove the 35% maximum lot coverage limit. They permit developers to add density using height, lot coverage, or a combination, up to a maximum FAR.

At 35ft (or 45ft with a CUP), FAR is still the limiting factor to overall building mass at all but the highest densities.

Gives the city a flexible policy tool to incentivize affordable housing

Reserving the maximum permitted height to a CUP leaves something in reserve – it gives the City a means to incentivize developers by making the grant of the permit conditional upon e.g. providing a minimum number of affordable housing units.

We appreciate your consideration on this matter.

Regards,

Monica Haas, Executive Director

Peter Rhoades, President

Simon Taghioff, ZLU Cmte. Chair