



August 10, 2018

Saint Paul City Council
15 West Kellogg Boulevard
Suite 310
St. Paul, MN 55102

Sent by Email

Re: Proposed Citywide Expansion of Accessory Dwelling Units

Dear Council President Brendmoen and Councilmembers Noecker, Thao, Tolbert, Henningson, Bostrom and Prince;

The Summit Hill Association District 16 Planning Council (SHA), at its meeting on August 9, voted to approve the following motion regarding the proposed citywide expansion of Accessory Dwelling Units: **We recommend Accessory Dwelling Unit(ADU) expansion in districts that have requested to opt-in to the expansion and to request the City to forgo city-wide expansion of ADUs until more community engagement has occurred and to allow more time for consideration of city-wide impacts for all neighborhoods.**

This vote followed a lengthy discussion which acknowledged the almost total lack of specific data on the potential impacts of such an expansion to the Summit Hill neighborhood (e.g., parking, affordability, changes in property taxes, enforcement mechanisms, changes to neighborhood character in a district which comprises local-, national- and state-designated historic districts, etc.) on which to base a decision which would address the unique needs of the district and questions raised by our community.

Furthermore, the Summit Hill Association was never advised that this ordinance would be expanded beyond the original five districts which were covered by the ordinance language—and who asked specifically for expansion to their districts—prior to the Planning Commission resolution and vote on June 1. We found out about the ordinance changes and result of the vote only after the fact.

The lack of previous notice to the Summit Hill Association of a proposed expansion beyond the original five districts prior to the June 1 Planning Commission vote on this not only did not allow us an opportunity to submit comment, but also did not:

1. Allow us time for public input prior to that vote;

2. Allow time for the in-depth examination and research we normally would undertake around the many issues and questions raised by such input at our July 19 public hearing attended by nearly 50 people to hear Jamie Radel's presentation and subsequently in several emails sent to SHA;
3. Allow time to explore potential alternative recommendations we might have made to address specific concerns.

While we were grateful to have the ordinance readings pushed back to allow us the single public input session we were able to arrange ahead of the third reading of the ordinance and the vote on same next week, we do not feel that we have had the time needed to take the steps outlined above. It is unclear why a matter which could have a major, long-term and permanent impact on our neighborhood is being pushed through on such an accelerated timeline.

Moreover, given the overall paucity of public input city-wide for even the original limited expansion (four attendees at city-wide sponsored sessions in April, only six oral testimonies and six written comments from individuals at the Planning Commission, a smattering of comments from St. Paul residents on Open St. Paul), it does not appear that there is a compelling need or desire for a city-wide expansion at this time, nor is it clear that the broader public has been adequately informed about this.

For your reference, attached are the comments received from Summit Hill residents prior to the Zoning and Land Use Committee public hearing held on July 19, and also prior to the board meeting held last night.

Thank you for the opportunity to consider and vote on this matter as a district council.

Yours truly,

Lori Brostrom
Chair, Zoning and Land Use Committee
Summit Hill Association District 16 Planning Council

cc: Rebecca Noecker, Councilmember, Ward 2
Taina Maki, Legislative Aide, Ward 2
Andrew Rorvig, SHA Board President
Monica Haas, SHA Executive Director

Attachment: ADU public comments.pdf