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CITY OF SAINT PAUL

Congregate Living Zoning Study

City Council Policy Committee
February 11, 2026



Today's Presentation

- Congregate living in St. Paul
- Recent issues
 - Conversions of sober houses to supportive housing
 - Large sober houses
- Legal context
- State law changes
- Other funding changes
- Recommended amendments
- Key policy questions



Congregate Living in St. Paul: Select Categories

- Sober House
 - For those recovering from chemical dependency
 - Financially self-supporting
 - No services on-site
 - Like a family
- Supportive Housing Facility
 - For those recovering from chemical dependency, or with mental illness or handicaps
 - Usually receive government funding
- Shelter for Battered Persons
- Licensed Correctional Community Residential Facility
- Overnight Shelter
- Emergency Housing
- Roominghouse
 - Individually rented bedrooms with community living space
 - Does not include anything that falls under another definition





Congregate Living in St. Paul: Minimum Separation Distances

- Sober House
 - 330' from each other
- Supportive Housing Facility, Shelter for Battered Persons, Licensed Correctional Community Residential Facility, Overnight Shelter, Emergency Housing
 - 1,320' from each other in most of the city
 - 600' from each other in downtown
- Roominghouse
 - None





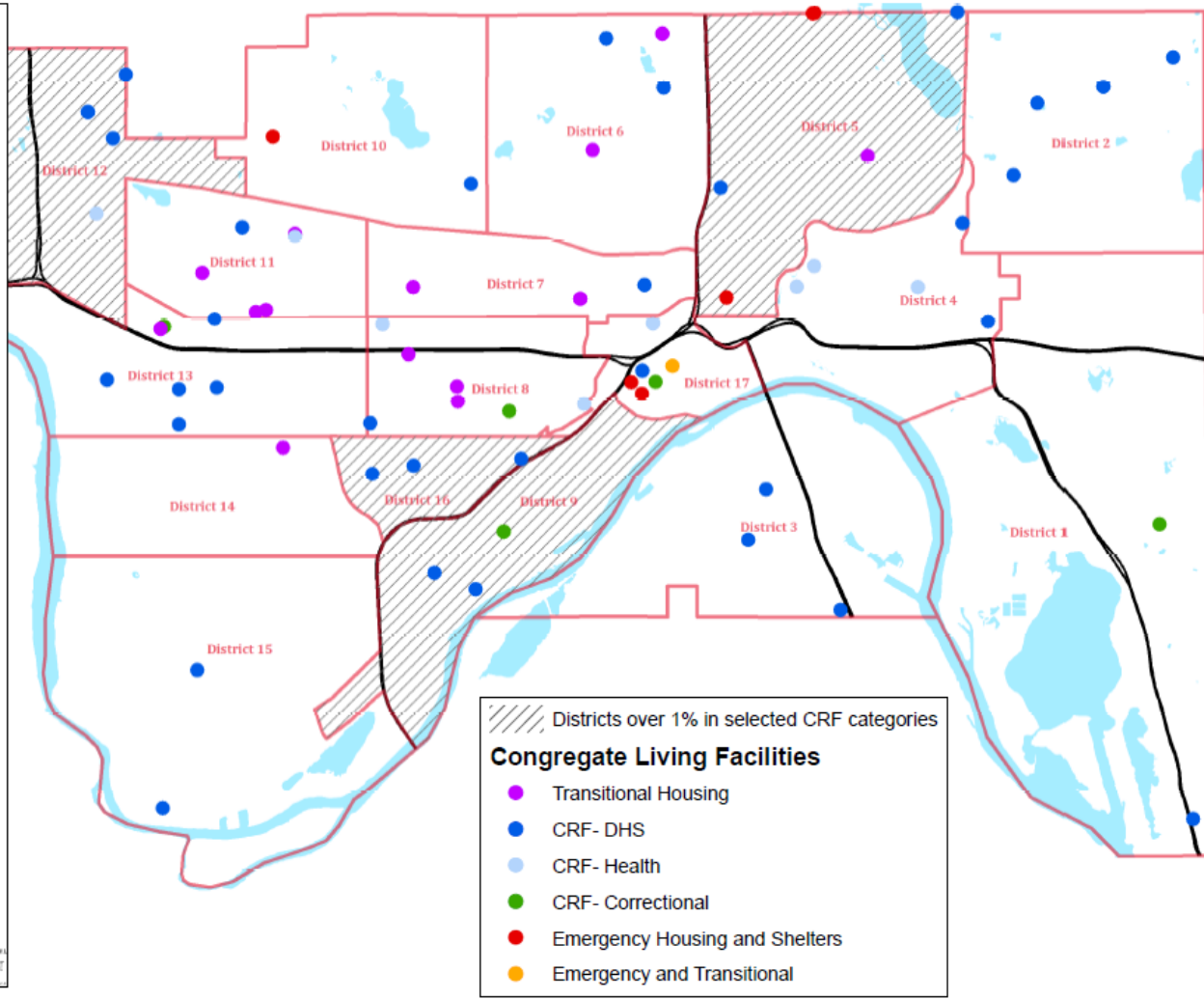


Congregate Living in St. Paul: How Many? (2021)

- Sober House: 59
- Supportive Housing Facility: 59
- Shelter for Battered Persons: 5
- Licensed Correctional Community Residential Facility: 5
- Overnight Shelter: 2
- Emergency Housing: 5
- Roominghouse
 - Not tracked

LO

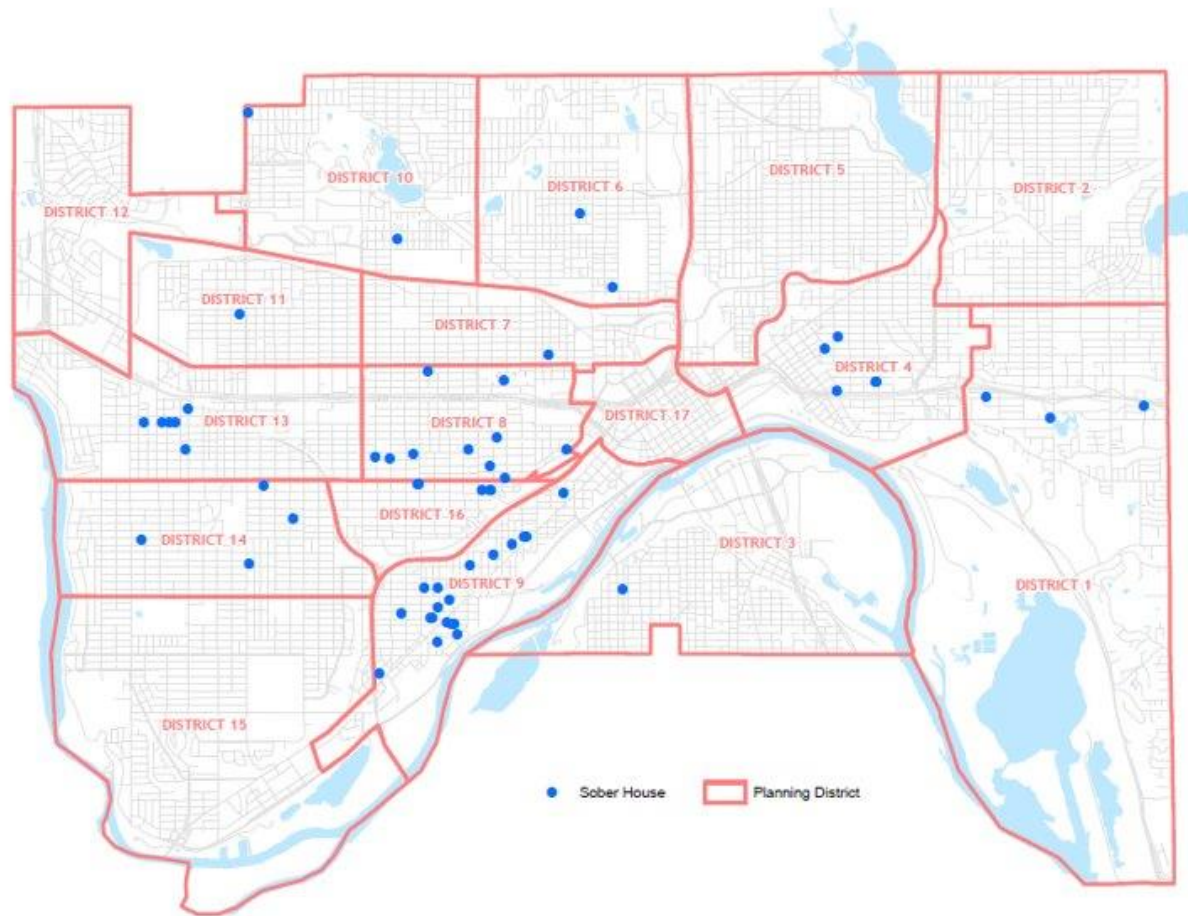
Congregate Living Facilities

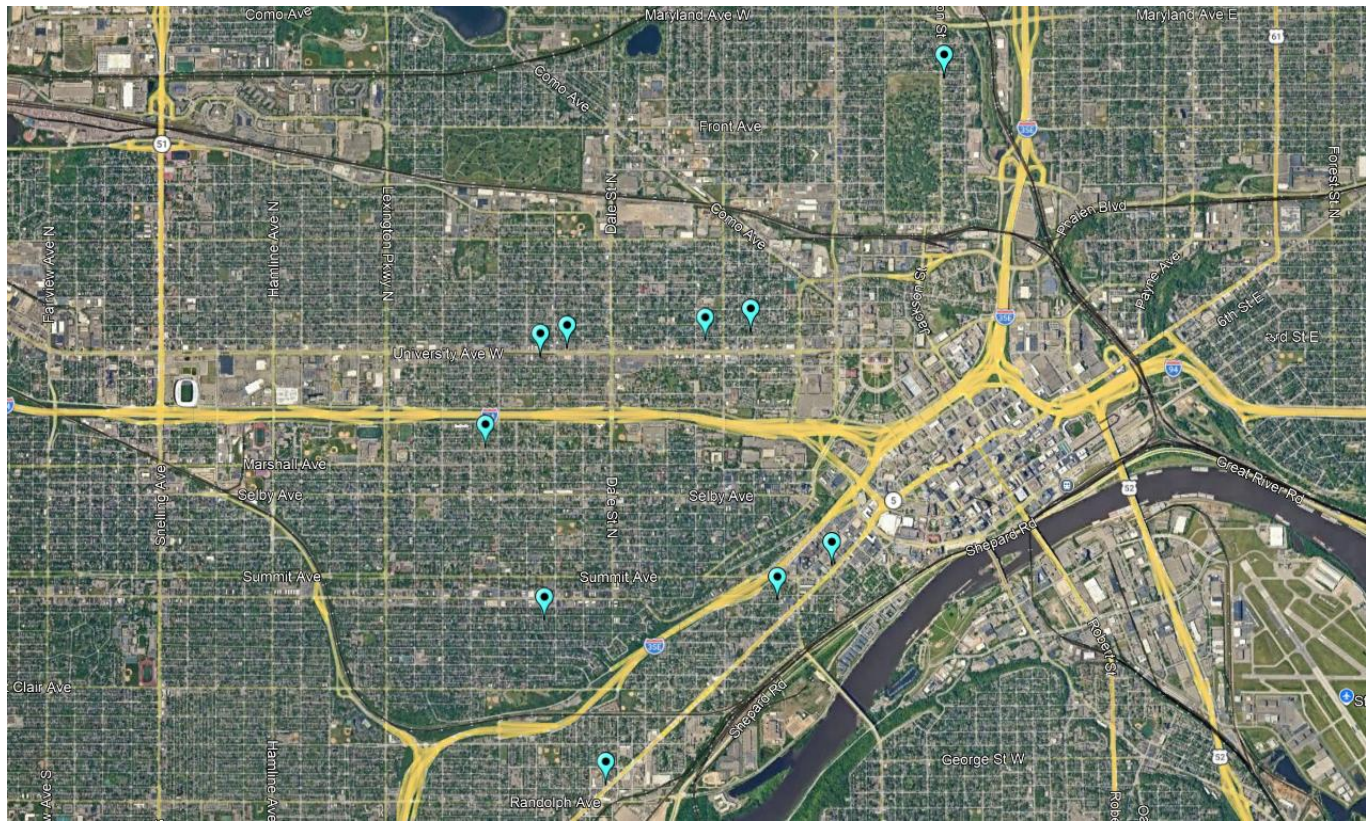


OLD



Sober Houses







Recent Issues: Conversions of Sober Houses to Supportive Housing

- Seek variances from 1,320' minimum separation
- Funding stream has changed (in at least some cases)
 - If they received outside funding before, they were technically already not “sober houses” under our code



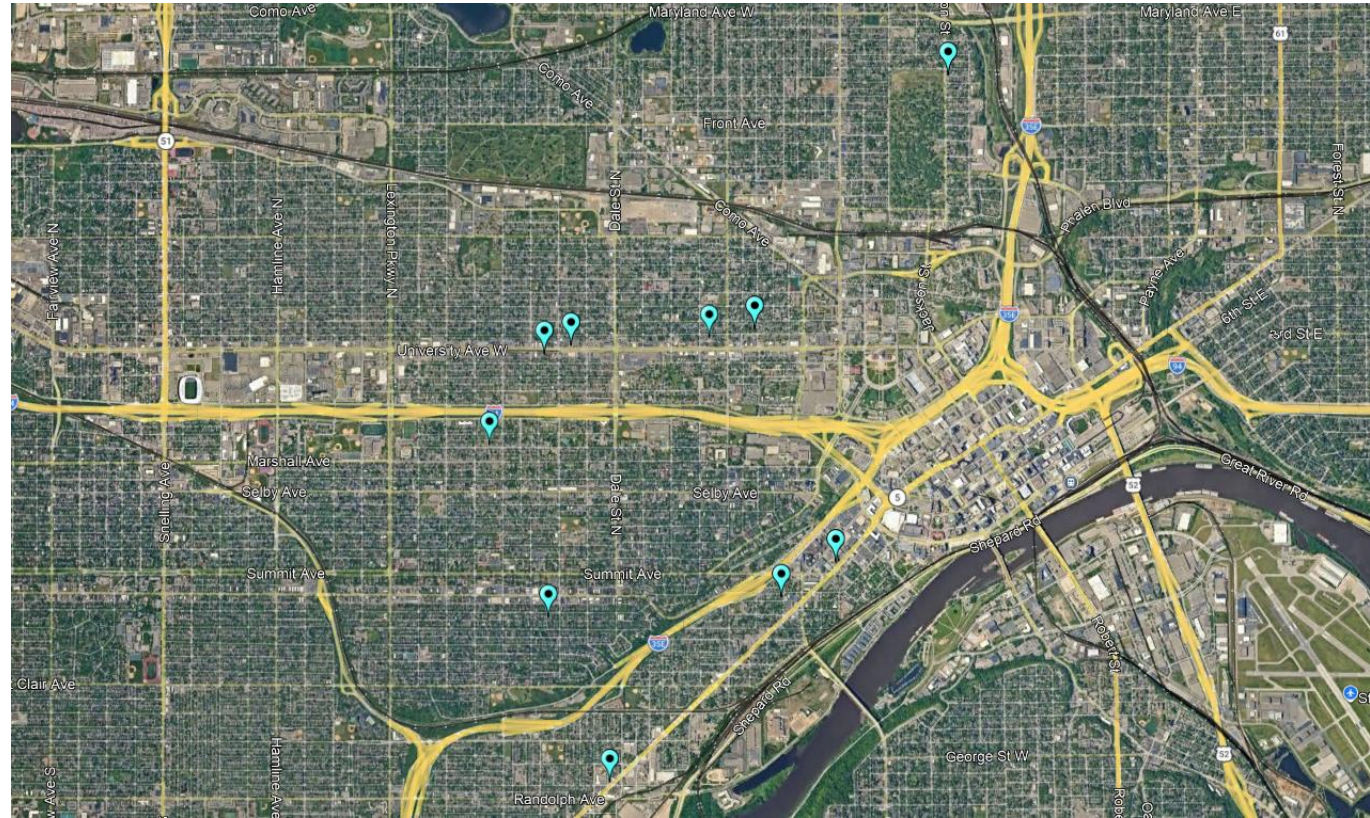
Recent Supportive Housing separation distances proposed via variance applications:

- 43'
- 513'
- 558'
- 588'
- 736'
- 804'
- 850'
- 944'
- 960'
- 999'

3 approved, 1 withdrawn, 6 denied (4 appealed to CC, 2 of those appeals denied and the others are on hold for moratorium)



Recent variances





Recent Issues: Large Sober Houses

- One potential operator sought 30+ residents
 - Current zoning regulations and reasonable accommodation practices may have allowed it
 - “A request for reasonable accommodation... providing an exception to the maximum number of unrelated persons living together in a dwelling unit shall automatically be granted...”
 - “The maximum total number of residents permitted in the sober house is specified by the fire certificate of occupancy”



Legal Context

- Americans with Disabilities Act (ADA)
- Fair Housing Amendments Act (FHAA)
- FamilyStyle v. City of Saint Paul (1990)
- Reasonable Accommodations
 - At least two elements seem to go beyond legal requirement:
 - Request is currently required for all sober houses, even those that meet code
 - “shall automatically be granted” code language, rather than individual evaluations that consider criteria based in federal law, such as: reasonableness, need for the accommodation to avoid discrimination, and whether it consists of fundamental alteration of the zoning regulations



State Law Changes

- Sober homes (first defined in 2023) will become “recovery residences” in 2027
- Recovery residences will have optional certification, with Level 2 certification (staff-run facilities) to be eligible for state funding
- Freestanding Room & Board program is being phased out
 - Was always intended for rural areas





Other Funding Changes

- Last April, at least two major service providers (NuWay, Evergreen) stopped redistributing State funds to third parties to fund sober residences
 - Many of these residential providers have since sought State funds through the Housing Supports program, which has requirements for provision of meals and services
 - Initially DSI identified meal provision as an additional trigger for these facilities not being Sober Houses, but later clarified that “nutritional services” are more structured than just bringing in meals





Major Recommendations by the Planning Commission

1. Amend reasonable accommodations process
2. Sober House *registration* (in place of requiring reasonable accommodation for all Sober Houses)
3. Sober House cap at 10 residents
 - Exceptions allowed only through a variance or a reasonable accommodations request
 - Reasonable accommodations evaluated on a case-by-case basis using standard legal criteria (rather than “shall be granted”)





Minor Recommendations by the Planning Commission

1. Clarify Sober House vs. Supportive Housing Facility definitions
2. Require CUP in fewer districts for a Shelter for Battered Persons
3. Other minor updates and clarifications



Not Recommended by the Planning Commission

1. Any change to the minimum separation distances between Sober Houses (330')

Why not?

- If they are truly family-like, then there is no need for a greater distance



Not Recommended by the Planning Commission

2. Any change to the minimum separation distances between Supportive Housing Facilities and certain other facilities, currently 1,320' in most of the city and 600' downtown

Why not?

- Management is the key factor
- With mgmt. regulation in need of improvement, potentially revisit in a couple years
 - Avoids flooding certain corridors (University, W 7th) for now
- Is same as Minneapolis, is reasonable, is needed to protect from recreating institutional environment, and is not new



Key policy questions

- How many adult residents should be permitted in a sober house?
- How far should sober houses be separated from each other?
- How far should supportive housing and certain other staffed congregate living with services be separated from each other?
- Should supportive housing be regulated by the City in other ways?



Congregate Living Zoning Study

www.stpaul.gov/planning and navigate to Current Activities

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