

Wade, Michael (CI-StPaul)

From: Jamie Stolpestad <jamie@yardhomesmn.com>
Sent: Friday, October 8, 2021 3:17 PM
To: *CI-StPaul_1to4HousingStudy
Subject: Re: Feedback on 1-4 unit housing study

see address below

Jamie Stolpestad
Partner, YardHomes MN
203-585-7248
Jamie@YardHomesMN.com

On Oct 8, 2021, at 10:38 AM, *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us> wrote:

Hi Jamie,

So sorry, one more thing. In order for your comment to be entered into the public record, all contributors are required to submit their address as well. You can edit the email one more time or simply send it in a response to this email and I will include it in the record.

Michael Wade

City Planner || Saint Paul Planning & Economic Development || 651-266-8703

From: jamie@yardhomesmn.com <jamie@yardhomesmn.com>
Sent: Thursday, October 7, 2021 2:00 PM
To: *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us>
Subject: Feedback on 1-4 unit housing study

Dear Sir or Madam,

I am writing to provide feedback on the 1-4 Unit Infill Housing Zoning Study.

My company, YardHomes, has a unique perspective on these topics as we interact with dozens if not hundreds of residents who are interested in adding housing to their property via an Accessory Dwelling Unit or ADU. There are 25 municipalities across Minnesota that have ADU ordinances, and St. Paul is currently among the more restrictive. Changes that you have proposed, and those that might still come forward, would better position the city to welcome this widely accepted and highly desirable housing typology.

Most people interested in an ADU are older and are seeking a cost-effective, accessible unit that is smaller than their current housing and allows them to stay in their neighborhood and age in community. Another large group of users are multi-generational families who wish to have more space for more family members in close proximity, and therefore provide resources for child and elder care, and to enhance the social cohesiveness that inter-generational living provides. Another group of interested

adopters are nonprofits that own land and/or existing housing and wish to add a unit, often to serve those most in need. Finally, please know that interest in ADUs has increased significantly through the Covid-19 Pandemic as more people are economically struggling and looking for lower-cost housing, and as more people are seeking a safe and close-by living option for aging parents.

A. I strongly support the following proposed changes:

1. Eliminating building width
2. Deleting language around a single principal dwelling
3. Restoring 4' setback for RM1-RM2 zoning districts
4. Adjusting minimum distance between structure rules to comport with State requirements
5. Deleting minimum lot area for an ADU
6. Increasing maximum area of accessory buildings to 1,200 sf
7. Eliminating duplex and triplex "guidelines" - which are not aligned with underlying zoning code requirements

B. Topics where I disagree and/or feel the Commission should take a different action:

1. Eliminate owner-occupancy requirements for ADUs. This was pushed from a Part 1 topic to a Part 2 topic but represents such a discriminatory rule and has such negative impacts on the city's housing market I believe it should be eliminated immediately. This provision was eliminated by a unanimous vote by both the Minneapolis Planning Commission and City Council last year. St. Paul is now in the unfavorable position of being in an extreme minority of cities – across MN and nationally - with such a discriminatory rule. This rule has an enormous negative impact on nonprofit housing owners and prevents new cost-effective housing on their property to meet the needs of our most vulnerable residents.
2. Don't limit ADUs only to back yards – allow them to go on side yards also. This is where so many residents have available land area and where it is most practical to add a unit.
3. Don't limit ADU to 35% of back yard. Most cities use the overall lot coverage in calculating the area for accessory structures, and this is much fairer across wealthier white neighborhoods vs. poorer neighborhoods of color. An overall lot coverage approach is also easier to administer.
4. Don't require immediate neighbor approval to add a carriage house. This pits neighbor against neighbor and results in uneven rights and opportunities across the city. Everyone should have the opportunity to add an ADU.
5. The front setback requirement that relates to existing homes is overly complex and burdensome. I recommend you use a standard dimension for front yard setbacks that the average property owner can understand and calculate from their own lot.
6. Minimum and maximum size of ADUs. Given the range of uses for an ADU and the unique conditions of existing structures, having broad flexibility around minimum and maximum sizes is useful, and care should be made in text language to make the calculations simple and practical in an effort to make it easier to add an ADU.
7. Height limits. One of the most confusing parts of the existing ADU ordinance is about height. Please simplify this to a single number and a clear explanation of how a regular property owner can calculate it.

C. Future action:

1. Act Faster. Many residents are suffering during our housing crisis. Many people are unsheltered and suffering tremendously. Some people complain that the Commission spends too much time studying things and isn't acting quickly enough. This is not an unreasonable criticism given the urgency of need.

2. Act more Boldly. The enormous scale of the housing crisis deserves bold action. Many of the steps outlined so far are largely incremental and do not have the scale of impact needed to create more housing. For the next phase of the study, please create opportunities for two ADUs per property or up to 3 units of housing on residential lots. Before the mid-1970's every property in St. Paul could house a

duplex. The city is already diverse with a wide range of housing options and this creates an interesting, appealing, vibrant and economically sustainable city. Having so much of the city's land area so limited to just a single large house is not aligned with the times and the housing needs of residents. Over 40% of households in the metro area are single-person households, with the fastest-growing segment those over 65. Those folks want and need smaller, more accessible and more cost-effective housing options. And many of them do not want to live in a giant impersonal apartment building.

3. Make it easier for the average person to navigate the process. The zoning ordinance has become way too complicated, way too long, and a far too burdensome obstacle course that very few people can navigate. Rather than make changes by addition, please find ways to eliminate old and unnecessary provisions and streamline and modernize the language. For example, the city has 18 different zones where residential uses can go. I don't know of another city in America that has so many different residential zones. Most cities have only 3. And the process of determining what is allowed and not allowed is far, far too complicated. Setbacks plus FAR plus area mins and maxes that are different by zone – are enough to cause the average person to throw up their hands and give up. And having a complicated process that takes 6 to 12 months to make changes or get a permit is far too long given the urgency of our housing needs.

Thank you for considering.

Jamie Stolpestad
Partner, YardHomesMN

475 Old Highway 8 NW
New Brighton, MN 55112

From: [Chris Wells](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Re: Support for Phase 1 amendments to zoning code
Date: Friday, October 8, 2021 12:07:25 PM
Attachments: [image002.png](#)

Chris Wells
1420 Fairmount Ave
St Paul, MN 55105

On Fri, Oct 8, 2021 at 10:36 AM *CI-StPaul_1to4HousingStudy
<1to4HousingStudy@ci.stpaul.mn.us> wrote:

Good Morning, Mr. Wells,

Thank you for your contribution to the public hearing! In order for your email to be entered into the record, please send along your address. This is a requirement for all public comment to be entered.

Michael Wade

City Planner

Pronouns: he/him/his

Department of Planning and Economic Development (PED)

1400 City Hall Annex, 25 W 4th Street

Saint Paul, MN 55102

P: 651-266-8703

Michael.Wade@stpaul.gov

www.StPaul.gov



SAINT PAUL
MINNESOTA

From: Chris Wells <wells@macalester.edu>
Sent: Friday, October 8, 2021 10:19 AM

To: *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us>
Subject: Support for Phase 1 amendments to zoning code

To the Members of the Department of Planning and Economic Development,

I'm writing to express my support for the proposed Phase 1 changes to the St. Paul zoning code, and to express my enthusiasm for even bolder zoning reform proposals next year in Phase 2. These are practical, common sense solutions to address the current housing crisis by allowing more housing, of all types, at a time when more housing is desperately needed.

As you consider the question of ADUs next year, I strongly encourage you to allow ADUs on all properties, not just homeowners who live on their property. If ADUs are to be a practical tool in efforts to expand housing, it makes no sense to exclude areas of the city with low rates of home ownership.

Best,

Chris

--

CHRISTOPHER W. WELLS (he/him/his)
Professor of Environmental Studies
Macalester College
651-696-6803 | <http://cwwells.net>
1600 Grand Avenue
Saint Paul, MN 55105 USA



Make an appointment with me [here](#).

--

CHRISTOPHER W. WELLS (he/him/his)
Professor of Environmental Studies
Macalester College
651-696-6803 | <http://cwwells.net>
1600 Grand Avenue
Saint Paul, MN 55105 USA



Make an appointment with me [here](#).

From: [Mark Thieroff](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Zoning Code amendments
Date: Friday, October 8, 2021 7:29:49 PM

I am writing to express my very strong support for the proposed Code amendments that have come out of the 1-4 unit infill study. While I agree that these changes as well as ambitious steps in Phase Two could make a meaningful impact on the availability of housing in St. Paul, and that the City should be doing everything it can to accomplish that goal, I was surprised by the lack of reference in the study to the impact of increasing housing density on achieving the City's climate goals. Many studies have shown that increasing housing density reduces carbon emissions, such as this one:

<https://www.law.berkeley.edu/research/cee/research/land-use/right-type-right-place/>

Our land use patterns remain dominated by the car-centric planning philosophies of decades ago that we must continue to move away from if we are to have any hope of reaching the City's climate goals. The more we talk about and recognize this reality, the easier it will be to usher in further necessary changes.

I am looking forward to bold action in Phase Two, including the end of single-family zoning and amendments that will make it easier to build infill housing by subdividing oversized single-family lots and building on nonconforming vacant lots to meet more flexible dimensional requirements.

Thank you.

Mark Thieroff
1438 Chelmsford St.



Sustain Saint Paul

Abundant housing, low-carbon transportation, and sustainable land use

October 8, 2021

Attention:

Mr. Michael Wade, Ms. Emma Siegworth, Luis Pereira

Mr. Richard Holst, Chair, Comprehensive and Neighborhood Planning Committee

Mr. Luis Rangel Morales, Chair, Planning Commission

St. Paul Department of Planning & Economic Developments

City Hall Annex

25 West Fourth Street, Suite 1300

Saint Paul, MN 55102

Re: 1-4 Unit Infill Housing Zoning Study – Phase 1 (the “Study”)

Dear All,

We are writing to provide feedback and suggestions related to the Study referenced above, in the hope of driving significant and positive change to the land use regulatory framework for the City of Saint Paul.

We applaud the Planning Commission, its Comprehensive and Neighborhood Planning Committee, and the Department of Planning & Economic Development for tackling these important topics, and for the very thoughtful and detailed work embedded within the Study. We feel there is the potential for meaningful progress to achieving the goals of the approved 2040 Comprehensive Plan and the various City Council Resolutions and policy goals of the City if these recommendations were to be fully implemented, but we also feel the Study falls short on some topics, which we address herein.

The overarching theme of our comments is simple: we must make it easier to build accessory dwelling units in Saint Paul. In the years since our original ADU ordinance was adopted, only a few ADUs have been constructed in the city. Several elements of the current ordinance—especially size

requirements and the owner-occupancy requirement— serve to exclude all but wealthy homeowners living on large lots from building an ADU. These exclusionary requirements must be removed if the ordinance is to achieve its core purpose: to catalyze the construction of low-cost housing units in our city.

This is an historic moment, and St. Paul is at a critical juncture. We are facing a housing crisis, and we have passed one of the most ambitious and visionary Comprehensive Plan documents in at least a generation. The challenge we see is to turn this ambitious vision into the day-to-day and practical reality in our Zoning Code. We encourage everyone, from Planning Commission members to the most junior staff members at PED and DSI, to keep in mind the need for bold action. When it might be comfortable to take a little step forward, please take a giant leap. The will of the people, and the vast majority of elected officials, are fully behind you. The future of our city is at stake. Thank you for taking this Part 1 further and thank you in advance for a bold and transformative Part 2 that is fully aligned with the 2040 Plan and City Council Resolutions.

Thank you for considering our feedback. We are happy to discuss our comments with you in further detail.

Sincerely yours,

Luke Hanson, Co-Chair
Liz Wefel, Co-Chair
Melanie Day, Secretary
Melissa Wenzel
James Slegers
Karen Allen

Sustain Saint Paul's Board of Directors

Appendix A: Proposed Text Amendments and Further Feedback and Suggestions

1. Where can ADUs go?

We recommend they not be limited just to Rear Yards as proposed. Many side yards are suitable and appropriate.

2. How tall can they be?

We recommend a clean-up and simplification of Sec 63.501(e) to something like, "In RL-RM2 residential districts, accessory structures shall not exceed fifteen (15) feet in height and accessory structures containing a dwelling shall not exceed twenty-five (25) feet in height."

We don't think it's appropriate to create a different height limit for different roof styles.

3. How much of a lot can an ADU cover?

We recommend the size not be tied to the rear yard but that the entire lot coverage be the governing ratio.

4. What about carriage houses?

We recommend Section 65.121 be deleted in its entirety. The reference to "domestic employees" is antiquated and adds no value. Importantly, to condition any type of ADU based on what immediate neighbors approve or don't approve is inappropriate to achieve the goals of the 2040 Plan and could lead to civil tensions and unequal opportunities.

5. How big or small can an ADU be?

We see no compelling rationale to limit the minimum or maximum size of an ADU. The overall lot coverage, FAR and other limitations of the underlying zoning district should apply. In addition, the building must comply with the specific implementation rules within the then-current Minnesota Residential Building Code, which now allows dwellings to be less than 400 square feet. We see no reason St. Paul should deviate from this state provision.

6. What about parking?

Since parking minimums have been eliminated by separate revision to the code, we recommend sections related to parking be updated or eliminated entirely if no longer relevant.

7. Owner-Occupancy

Limiting an ADU to households with owner-occupancy is bad policy and does not align with the aspirations of the 2040 Plan or the City Council resolutions. We recommend “studying the elimination of the owner-occupancy provision” be addressed in Part 1 as originally intended, and that the study recommend this provision be eliminated.

8. Duplex and tri-plex conversion guidelines

Congratulations on removing these unnecessary constraints to adding more housing in St. Paul! The ability to have two or three households on a lot in this housing format, without regard for owner-occupancy, is another reason the owner-occupancy provision in the ADU ordinance should be eliminated.

From: [Ellen Bendewald](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: 1-4 Unit Housing Study
Date: Sunday, October 10, 2021 3:20:58 PM

Hello,

I am a renter in downtown St. Paul, writing about the 1-4 Unit Housing Study. I am concerned about the housing crisis in St. Paul and want the city to enact bold and practical changes to allow more housing of all types in all areas of the city. The zoning changes proposed in Phase One are a step in the right direction.

Saint Paul's current Accessory Dwelling Unit policy is too constraining to allow an average homeowner to create a good looking and functional ADU at a reasonable cost. We should not limit Accessory Dwelling Units only to homeowners who live on their property. The right to add an ADU should be provided on all residential lots in the city. Everyone can help address our housing crisis, and we should not discriminate against poorer neighborhoods where there are lower rates of home ownership.

I support the changes recommended by the City in Phase One of the 1-4 unit infill study, but they are not enough. Saint Paul now has the largest housing crisis in the country, and it is time for bold and urgent action. I urge you to pursue ambitious changes to the Zoning Code in Phase Two in 2022.

Thank you for your work on this issue!

Ellen Bendewald
180 E Kellogg Blvd
St. Paul, MN 55101

From: [Mark Gilbert](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Zoning Code Changes
Date: Sunday, October 10, 2021 3:39:38 PM

Greetings:

I am writing to thank you for your work on zoning code updates for St. Paul. I fully support allowing a wide range of more dense home building in St. Paul. The Phase 1 and Phase 2 I read about sound great. I'd also like to see less expensive construction allowed, like pre-fab homes, as long as safety standards are maintained. And, I think that in busy corridors, we should allow taller buildings than we currently do.

Thanks again!
Mark Gilbert
Macalester Groveland, St. Paul

From: [Tumbleweed Weed](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Housing density
Date: Sunday, October 10, 2021 6:19:57 PM

Hi,

Weighing in on changing zoning to allow more density. We have sprawled for too many years and it's time to tighten our belts for a bit and allow more housing within the city itself.

Sprawling out cost a lot of money to maintain all that infrastructure! I love living in the city but barely afford to live here. Thanks.

Russ Yttri
658 greenbrier st
#11
St. Paul

From: [Pat Thompson](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Support for changes to Zoning Code on housing choices
Date: Monday, October 11, 2021 4:22:54 PM

Hello,

I'm writing to say I support this first round of changes to the Zoning Code, and my only disappointment is that the proposal doesn't already include the expansion to allow at least up to triplexes anywhere. I would love to see four-plexes anywhere, myself.

For instance, I live in a single-family-only zoning area. Multiple houses here could be converted to duplexes or triplexes — except for the current restrictions. There are some open lots that could be built up to four-plexes easily.

We need to make room for more neighbors, given the climate crisis, and also recognize that household unit sizes are often not what they were in the past. Our housing stock needs to be retrofitted to reality.

—

Pat Thompson
1496 Raymond Avenue

From: [Zakary Yudhishthu](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Voicing My Support
Date: Tuesday, October 12, 2021 11:33:45 AM

Hello,

My name is Zak Yudhishthu. I'm a student at Macalester College, and the student representative for the Macalester-Groveland Community Council.

I'm writing to express my support for Phase 1 of the City's housing study. These changes represent important first steps to addressing housing crisis.

The fact that the Phase 1 recommendations are relatively incremental should affirm the city in moving forward here. It's apparent that the minor changes in the code outlined here are not going to destroy neighborhood character, and disingenuous arguments of that ilk shouldn't deter the city.

I also urge the city to be bold in Phase 2. There's no contention about whether single-family zoning is exclusive, and I'm sure that the city understands how it contributes to the housing shortage and creates far too many cost-burdened households. So it's time to follow our peers —not just Minneapolis, but now Portland, Oregon, and the whole of California — and rezone for multifamily housing across the city.

Sincerely,
Zak Yudhishthu

From: [Jake Rueter](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Support for Zoning Code Changes
Date: Tuesday, October 12, 2021 6:42:17 PM

Hello PED Staff,

Thank you for putting together such a compelling list of options to think big about how zoning in Saint Paul can allow for more housing options. I urge you to support the more expansive vision in Phase 2.

Take care,

Jake Rueter
1347 Blair Ave, St Paul, MN 55104



320 South Griggs Street
St. Paul, MN 55105
www.macgrove.org

651-695-4000
mgcc@macgrove.org

October 13, 2021

Saint Paul Planning Commission
City Hall, Room 40
15 Kellogg Blvd.
Saint Paul, MN 55102
VIA EMAIL

Re: Phase 1 of the 1-4 Housing Unit Study

Dear Saint Paul City Planning Commission Members:

On September 22, 2021, the Housing and Land Use Committee of the Macalester Groveland Community Council ("MGCC") held a public eMeeting via Zoom, at which it considered the proposed changes outlined in Phase 1 of the 1-4 Housing Unity Study by the City of Saint Paul Department of Planning and Economic Development.

Prior to the meeting, MGCC did not receive any written comments in support or in opposition of the application.

After speaking with staff members from the Department of Planning and Economic Development, considering neighborhood feedback, consulting the Macalester Groveland Long Range plan and 2040 Comprehensive Plan, and assessing the merits of the proposed changes, the Housing and Land Use Committee passed the following resolution by a final vote of 12-3, with 2 abstentions:

***** The MGCC Housing and Land Use Committee recommends approval of the changes outlined in Phase 1 of the 1-4 Housing Unit Study by the City of Saint Paul Department of Planning and Economic Development. *****

If you have questions or concerns, please do not hesitate to contact me.

Alexa Golemo
Executive Director
Macalester-Groveland Community Council

cc (via email): Ward 3 Office, City of Saint Paul
Ward 4 Office, City of Saint Paul
Emma Siegworth, City of Saint Paul PED
Josh Williams, City of Saint Paul PED

Wade, Michael (CI-StPaul)

From: Daniel Tikk <daniel.m.tikk@gmail.com>
Sent: Thursday, October 14, 2021 12:04 PM
To: *CI-StPaul_1to4HousingStudy
Subject: Re: Phase 1 of 1-4 Unit Infill Housing Study

791 Ashland Ave, St Paul, MN 55104

Thank you,
Daniel

On Thu, Oct 14, 2021 at 11:44 AM *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us> wrote:

Good morning,

Thank you for your contribution to the public hearing! In order for your email to be entered into the record, please send along your address. This is a requirement for all public comment to be entered.

Best,

Emma Siegworth

City Planner

Pronouns: she/her

Department of Planning and Economic Development

1400 City Hall Annex, 25 West Fourth Street

Saint Paul, MN 55102

P: 651-266-6657

emma.siegworth@ci.stpaul.mn.us

www.StPaul.gov



SAINT PAUL
MINNESOTA

From: Daniel Tikk <daniel.m.tikk@gmail.com>
Sent: Thursday, October 14, 2021 11:17 AM
To: *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us>
Subject: Re: Phase 1 of 1-4 Unit Infill Housing Study

Dear PED staff and Planning Commission,

Thank you for the opportunity to submit comments regarding Phase 1 of the 1-4 Unit Housing Study being undertaken by the City of St. Paul. I write to voice my support for the efforts undertaken in the proposed language to ease some of the restrictions on housing in the city, including for ADUs as well as discontinuing the duplex and triplex conversion guidelines. These are positive steps that will be beneficial to expand the variety and quantity of housing.

However, I believe the proposed language can be adjusted to go even further, in order to truly rise to the level of bold action necessary to be as impactful as desired. The proposed amendments continue to maintain a number of unnecessary restrictions which will limit the effectiveness of this strategy.

For instance, ADUs should not be limited to only owner-occupied properties, as renter-occupied properties will already have in place experience with property management. In addition, the additional revenue from ADUs for renter-occupied properties would assist owners who have been raising concerns about rising property taxes as well as the proposed rent stabilization ordinance. In addition, there should not be limitations placed on the maximum size of ADUs or limiting them to the rear yard of a property.

Overall, I support the proposed changes, as every step the city can take to ease the housing crisis is worthwhile. However, I also urge you to be even more ambitious, both with the proposed changes to Phase 1 as well as the direction you take with Phase 2. More flexibility, more availability, and more residents should be the guide for all decisions made in regards to housing.

Thank you,

From: [Elizabeth Wefel](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Support for proposed zoning changes
Date: Thursday, October 14, 2021 10:11:54 AM

Dear members of the planning commission,

I'm very concerned about the housing crisis in Saint Paul. To address this crisis, the city must enact bold changes to allow more housing of all types throughout the city. The phase one proposed changes are a good first step, but not enough.

The current Accessory Dwelling Unit ordinance is to constrain as evidenced by the few homeowners who have taken advantage of it. The right to add an ADU should apply to all lots throughout the city and should not require that the homeowner live on the property.

Thank you for your consideration.

Elizabeth Wefel
Ward 3 - Macalester groveland
444 WARWICK STREET

From: [Kevin L. Vargas](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: 1-4 Housing Study Support
Date: Thursday, October 14, 2021 9:35:48 AM

Hello,

My name is Kevin and I live on 1034 Cleveland Ave S. I support the changes recommended by the City in Phase One of the 1-4 unit infill study, but they are not enough. Saint Paul now has the largest housing crisis in the country, and it is time for bold and urgent action. I urge you to pursue ambitious changes to the Zoning Code in Phase Two in 2022, such as legalizing Missing Middle Housing throughout the city.

Thank you.

Kevin Vargas

--

Best,
Kevin

From: [Luke Hanson](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Re: Supporting "Phase One" amendments
Date: Thursday, October 14, 2021 1:36:29 PM
Attachments: [image002.png](#)
[image002.png](#)

1423 Eleanor Avenue, St. Paul, MN 55116

On Thu, Oct 14, 2021, 11:43 AM *CI-StPaul_1to4HousingStudy
<1to4HousingStudy@ci.stpaul.mn.us> wrote:

Good morning,

Thank you for your contribution to the public hearing! In order for your email to be entered into the record, please send along your address. This is a requirement for all public comment to be entered.

Best,

Emma Siegworth

City Planner

Pronouns: she/her

Department of Planning and Economic Development

1400 City Hall Annex, 25 West Fourth Street

Saint Paul, MN 55102

P: 651-266-6657

emma.siegworth@ci.stpaul.mn.us

www.StPaul.gov



From: Luke Hanson <lukehanson91@gmail.com>
Sent: Thursday, October 14, 2021 10:45 AM
To: *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us>
Subject: Supporting "Phase One" amendments

Hi,

My name is Luke Hanson, and I live in Ward 3. I am writing to voice my strong support for the amendments proposed in "Phase One" of the 1-4 unit infill study. They represent a small step in the right direction to make it easier to expand housing choices in Saint Paul.

I also believe that these proposed amendments do not go nearly far enough to respond to our housing crisis, which is the worst in the nation. I am disappointed that the City's Planning team has not proposed to eliminate the Owner Occupancy requirement for ADUs in Phase One, as it had originally proposed, and delayed this consideration to Phase Two. It's past time that our City stopped putting off bold, progressive reforms to our City's zoning and housing policies: ending Single-Family Zoning (which reinforces the legacies of redlining and racial covenants), legalizing Missing Middle Housing citywide, and designing incentives for developers to add affordable units to new construction. I believe that the majority of Saint Paulites support bold actions like these, and I implore you to pursue these goals and others in Phase Two (or sooner!).

Sincerely,

Luke Hanson

Wade, Michael (CI-StPaul)

From: Terri Thao <territhao1@gmail.com>
Sent: Thursday, October 14, 2021 10:32 AM
To: *CI-StPaul_1to4HousingStudy
Subject: Re: Testimony for 10/15/21 Public Hearing on 1-4 Unit Infill Housing Zoning Study

Follow Up Flag: Follow up
Flag Status: Completed

Sure it's 1492 Clarence St, St. Paul, MN 55106

On Thu, Oct 14, 2021 at 10:31 AM *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us> wrote:

Good Morning, Ms. Thao,

Thank you for your contribution to the public hearing! In order for your email to be entered into the record, please send along your address. This is a requirement for all public comment to be entered.

Best,

Emma Siegworth

City Planner

Pronouns: she/her

Department of Planning and Economic Development

1400 City Hall Annex, 25 West Fourth Street

Saint Paul, MN 55102

P: 651-266-6657

emma.siegworth@ci.stpaul.mn.us

www.StPaul.gov



SAINT PAUL
MINNESOTA

From: Terri Thao <territhao1@gmail.com>

Sent: Wednesday, October 13, 2021 8:11 PM

To: *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us>

Subject: Testimony for 10/15/21 Public Hearing on 1-4 Unit Infill Housing Zoning Study

October 13, 2021

Dear Planning Commission Members,

My name is Terri Thao and I am a mother, worker, advocate, volunteer, and longtime resident of St. Paul. I am writing this letter in regards to the proposed 1-4 Unit Infill Housing Zoning Study PHASE 1. The majority of the policies being proposed are great solutions to how we will increase housing density in the city of St. Paul, however there are few recommendations I would like to make in regards to the proposed zoning study.

First and foremost, we desperately need more homes to be built in the city and at different affordability levels. The most recent Census data noted that St. Paul grew by 9.3% yet our housing stock has not increased by this same percentage according to the 2021 Minnesota's Housing Scorecard (<https://frontdoorcampaign.org/marking-our-progress>). In addition to this we rents are also increasing and almost 50% of families across the state pay more than 30% of their income to rent, increasing their cost burdens (Minnesota Housing Partnership State of the State's Housing 2021 Report <https://mhponline.org/images/stories/docs/research/reports/KeyFindingsOnePager.pdf> with a higher number of Black, Indiegenous, and People of Color (BIPOC) households paying more than half of their disposable income on rent alone. Coincidentally the population growth in St. Paul is amongst BIPOC communities so I do worry about being able to create housing stability for our families and upcoming workforce participants.

My second comment is that we need to stop studying, start acting. As a former planning commissioner and long time policy maker, I understand that our systems move slower to ensure engagement and thorough planning, however, this study comes on top of other work being done on a state and regional level that has called for increased and creative housing solutions. We can shift policies once we learn about the impact of their work. Please do not let perfect be the enemy of good.

Last but not least, in regards to the language in the ordinance, I would recommend elimination of all these restrictions on adding an Accessory Dwelling Unit (ADU), including the horribly discriminatory owner-occupancy rule. I understand the original intent was to prevent the bad actors from taking

advantage of potential renters or provide substandard housing. However, in St. Paul, we already have several thousand non-owner occupied units in St. Paul; the majority of which are properly managed. It is only the bad (and really bad ones) that receive the attention and which we should not be making public policy for these few, but instead creating policies where a larger number would benefit - and benefit from having a roof over their heads.

Thank you for your time and taking my testimony today,

Terri Thao

Wade, Michael (CI-StPaul)

From: Rick Varco <rvarco@hotmail.com>
Sent: Friday, October 15, 2021 10:04 AM
To: *CI-StPaul_1to4HousingStudy
Subject: Study Comments

St. Paul has a housing crisis. We must enact bold and practical changes to allow more housing of all types in all areas of the city. The zoning changes proposed in Phase One are a step in the right direction.

Saint Paul's current Accessory Dwelling Unit policy is too constraining to allow an average homeowner to create a good looking and functional ADU at a reasonable cost.

Everyone, not just homeowners who live on their property, should be able to add an ADU, because everyone needs housing. The right to add an ADU should be provided on all residential lots in the city. Everyone can help address our housing crisis, and we should not discriminate against poorer neighborhoods where there are lower rates of home ownership.

I support the changes recommended by the City in Phase One of the 1-4 unit infill study, but they are not enough. Saint Paul now has the largest housing crisis in the country, and it is time for bold and urgent action. I urge you to pursue ambitious changes to the Zoning Code in Phase Two in 2022, such as legalizing Missing Middle Housing throughout the city.

Beyond that we should recognize limits on housing density serve no justifiable public policy and should be scrapped whenever possible.

Rick Varco
2265 Yougman Ave #208
St. Paul MN 55116

CITY OF ST PAUL
DEPARTMENT OF PLANNING & ECONOMIC DEVELOPMENT

October 18th, 2021

RE: Public Comments on 1-4 Unit Housing Study, Phase 1.

Dear Planning Department Staff:

The Zoning and Land Use Committee of the Summit Hill Association offers the following comments on the 1-4 Unit Housing Study, Phase 1. We discussed the proposed changes at working meetings during September, but given the timing of the public comment and other board obligations (including our annual meeting), the full board was not able to vote on our recommendations. We are having a rotating substitute chair among committee members while our chairperson is on paternity leave.

We support the stated goals of the first phase of 1-4 Unit Infill Housing Zoning: “to reduce barriers to **neighborhood-scale residential** development.”

Neighborhood-scale development has been called “Missing Middle”—defined as “a range of house-scale buildings with multiple units—compatible in scale and form with detached single-family homes—located in a walkable neighborhood” (MissingMiddleHousing.com). Summit Hill is fortunate to have a wide range of this type of “middle” housing. Missing Middle is “missing” because many zoning codes, including ours, have created barriers to this scale of housing. In Summit Hill, like other historic St Paul neighborhoods, much of this mid-scale housing was built before the 1920s, and remarkably few examples have been built since the introduction of the current zoning code in 1975.

As we looked at the details of the proposed amendment, we looked around at the excellent examples of historic Missing Middle housing in our neighborhood. The two- and three-story brick apartments and condos both on and off Grand Avenue, the former carriage houses, the third floor apartments in large houses, the converted mansions, triplexes and duplexes, the townhouses and rowhouses. Our district’s Middle density housing supports walkability, and also creates economic diversity in housing options. We see it as one of the strengths of our district. Our goal was that these amendments would allow more housing to be developed that is similar in form and scale to our historic models.

We also appreciate the recognition of *barriers*. We used this lens to evaluate the proposed amendments as well. There are two types of barriers we wish to underscore. The first is the time and expense of extra processes, specifically variances and

conditional use permits. These types of bureaucratic processes are a significant barrier *for smaller scale projects*. Stated differently, a large scale project is less likely to see the costs or time to apply for a CUP or variance as meaningful hurdle. We appreciate that easing this is a stated goal of Phase 1. The flip side of this is the barrier of the zoning code itself—it is dense, complicated, and hard to read. This is a barrier to accessibility, and, once again, is a more significant barrier for a smaller scale project. This reduction of barriers is the second lens we used in evaluating the changes.

We, generally speaking, would like to see footnotes used more sparingly, made more clear, and limited to one topic per footnote. Additionally, we appreciated the bulleted sections in the proposed changes to footnote 65.501 (f) as a clear and more accessible manner to break down a complex topic. We have attempted to use this as a model in our suggestions. Footnote (h) is notably dense with several topics, and would greatly benefit from bulleted or hierarchical presentation.

Based on these two lenses, we offer the following suggestions for improvements to the amendments.

In places we have made specific recommendations for text amendments, in others we have simply pointed out areas that we think need deeper study. We offer these suggestions in the interest of improving accuracy and clarity, increasing zoning code comprehension and accessibility, and supporting Missing Middle development.

Sincerely,

Zoning and Land Use Committee
Summit Hill Association

Recommendations

66.233. - Minimum building width

Support as is, reduces the need for a variance for existing small lots; variances are an expense in time and money that can serve as a barrier to development, and that can increase building costs.

§ 66.241. - Number of main (principal) buildings

Support as is, reduces the need for a CUP for building more than one house on existing large lots; CUPs are an expense in time and money that can serve as a barrier to development, and that can increase building costs

Sec. 65.121. – Dwelling, carriage house

Suggestions for better clarity:

Replace this section with a reference to ADUs. (See 65.913 for changes to ADUs)
Rationale: carriage houses would now have a much higher barrier threshold (signatures from neighbors, historic use by domestic servants, etc.) but, assuming other proposed Phase 1 changes are adopted, would no longer have any increased benefit compared to an ADU (other than perhaps being able to choose to be an additional residential building or an ADU, but this is now allowed on large lots everywhere due to changes to 66.241) . This will simplify the zoning code to have one process.

Sec. 65.121. – Dwelling, carriage house

An detached accessory dwelling unit in a combined residential and garage building, separate from the main building on the lot, located above and/or adjacent to the garage.

Standards and conditions in residential districts

*Proposed
amendment
- § 65.121:*

See 65. § 65.913. - Accessory dwelling unit

§ 65.913. - Accessory dwelling unit: (a) *Minimum lot size* (e) *Unit Size*

Support elimination of minimum lot size requirement (5,000 SF) and simplification of building size limits.

Support the *title* given to each aspect—this makes the zoning code more readable and accessible.

(1) Suggestions for better clarity:

The [hand out](#) for ADUs lists three distinct types of ADUs: Interior ADU, Attached ADU (via addition), or Detached ADU, complete with illustrations. The requirements for each type are slightly different. For increased clarity, we would recommend listing the three types here (in footnote (a) that is being eliminated), and, if at all possible, including the illustrations.

(2) Suggestions to decrease a barrier and avoid unnecessary costs:

Simplify the size changes. The intent is to allow larger ADUs on larger lots. Computing the size of a house is professional skill. Retaining the 800 SF (former) limit by right, but allowing an increase for large lots, will decrease a barrier.

(3) Suggestions to decrease a barrier:

Simpler computation for building size. Most people understand square footage and footprint¹, as they are common terms in real estate. Neither of these is defined in Zoning code. Recommend use of *square footage* instead of the defined term *floor area*. The common conception of square footage is the defined term *maximum gross floor area*, which is intended only for the computation of parking, per the definition.

Floor area does not include attached parking –this is a problem for clarity and intent. (1) It adds unnecessary complexity to computing the application. Secondly, by excluding the parking area, it could make for too large (i.e. not subordinate) detached ADUs.

¹ *Floor area*. The sum of the horizontal areas of each floor of a building, measured from the interior faces of the exterior walls or from the centerline of walls separating two (2) buildings. The floor area measurement is exclusive of areas of basements, unfinished attics, attached garages, or space used for off-street parking or loading, breezeways, and enclosed and unenclosed porches, elevator or stair bulkheads and accessory structures. *Floor area, gross* (for the purposes of computing parking). The sum of the horizontal areas of each floor of a building, measured from the exterior faces of the exterior walls or from the centerline of walls separating two (2) buildings. The gross floor area measurement is exclusive of areas of unfinished basements, unfinished cellars, unfinished attics, attached garages, space used for off-street parking or loading, breezeways, enclosed and unenclosed porches and accessory structures.

(Footprint is more or less included in the definition of *lot coverage*², and is used for accessory buildings.) Side note: Minneapolis recently changed their zoning code for accessory buildings from a lot coverage standard to an FAR. We recommend NOT using FAR for 1-4 Unit, due to its complexity. Additionally, in Minneapolis, the move to the FAR standard has created an unintended barrier to adding second floor space for home offices etc. that would have been allowed under the former combined lot coverage and height limit.

(4) Suggestions to decrease a barrier:

Formatting to separate distinct concepts

Compilation of Suggestions

- (a) *Type of accessory units.* Accessory Dwelling Units may be Interior Attached, Attached via Addition, or Detached.
- (b) *Number of accessory units.* There shall be no more than one (1) accessory dwelling unit on a zoning lot.
- (c) Compliance with other city, local, regional, state and federal regulations. Pursuant to section 60.109 of the Zoning Code, all accessory dwelling units must comply with city, local, regional, state and federal regulations.
- (d) *Unit occupancy.*
- ...
- (e) *Unit size.* The square footage for accessory units shall be a maximum of eight hundred (800) square feet. The maximum square footage can be increased if the following conditions are met:
 - (1) For Detached Accessory Units: ~~The floor area~~ square footage can be increased up to 75% of the floor area of the principal dwelling, whichever is larger.
 - (2) For Interior Attached and Attached Accessory Units via Addition: The square footage can be increased to up to 1/3 of the square footage of the principal dwelling.
 - (3) For Interior Attached ADUs located in multi-story principal buildings structures built prior to the enactment of this section, the maximum floor area of ~~an~~ the interior accessory dwelling unit may be increased up to equal to that of the first floor, but shall be less than or equal to fifty (50) percent of the floor area square footage of the building structure.

² *Lot coverage.* The part or percent of the lot occupied by the above-grade portion of buildings

§ 66.231. – Density and dimensional standards table (f) and § 66.331. – Density and dimensional standards table (i)

This is an area where we have more open-ended suggestions. Our committee had lengthy discussions on the front yard setbacks. In short: the goal to “move toward conformity”³ could lead away from “missing middle” housing and is not a goal we would support. We very much support retaining “match existing” as a modification for setbacks. However, we also support the stated goal of reducing the complexity of computing it. We recognize that this is a difficult balance to strike.

Philosophical difference: in the rationale for this change, the desire to create conformity over time is antithetical to the purpose of this provision. We have a lot of examples of shortened front setbacks in Summit Hill, generally on “side lots” that front the side streets. These are, typically, either (a) smaller houses with smaller lots, or (b) multifamily housing, often on smaller lots. The shallower setbacks are (1) needed for these housing types and (2) an interesting and important aspect of our neighborhood. This is true in other older parts of St Paul as well. (W 7th, Ramsey Hill, etc.) In other areas of the city, for example the extra deep setbacks along Mississippi River Blvd the established setbacks are fundamentally important to the unique character of these neighborhoods.

We also have clarification questions: the proposed changes recognize the “setback requirement of the district”; how does that work when adjacent properties are zoned differently, with different setbacks?

Finally, requiring certificate of survey is an expense that can be prohibitive for small projects. We want to promote/allow small developments as well as large. Members of our committee felt that small projects are particularly beneficial and should be given special promotion on the zoning code. Small scale projects have lower construction costs per square foot (lowering housing costs), are more likely to be locally owned, and promote fine-grain urbanism (see [Marketreport Strong Towns Andrew Alexander Price](#))

Support simplifying average front yard setback computations

Suggestions to avoid increased barrier:

Similarly, surveys are a professional service that represents a significant expense on a small project. For additions or a detached ADU that is sited far from setbacks, a professional survey may not be required. Survey should only “may be required.” The

³ “Additionally, basing the setback for a new structure on the adjacent existing setback that is closest to the district standard setback can both simplify the calculation and gradually move the block face toward the district standard”

provision should continue to apply to new “structures”, and not just new buildings, so that additions are subject to the established setbacks as well.

Suggestions to avoid unintended consequences:

The intent is to simplifying average front yard setback computations, but an unintended consequences could be (1) more variances for small lots and (2) loss of neighborhood features and character.

Clarification Question to avoid unintended consequences:

Second, we have a clarification question regarding “setback requirement of the district” and how that works when adjacent properties are zoned differently, with different setbacks. This happens in areas adjacent to mixed use corridors. We would like the zoning code to support green space and transitions.

In summary, we think this provision needs further study and discussion.

(a) Established Front Setback: The front setback requirements will be based on the existing setbacks when the following two conditions exist:

- (1) Where at least fifty (50) percent of the front footage of any block is built up with principal ~~structures~~ residential buildings
- (2) The ~~and the~~ front yard setbacks of existing buildings with front yards that adjoin the front yard of the lot are all greater or all less than the district standard setback requirement⁴,

When both of the above conditions are met, the minimum front yard setback for new ~~structures~~ buildings shall be the average setback of the existing two adjacent structures.

- (a) Where only one existing front yard adjoins the front yard of the lot, the minimum front yard setback for new buildings shall be determined based on the average of the adjacent building and the next closest front setback on the same block face.
- (b) If there is only one structure on the block face, the setback will be the midpoint of the adjacent structure and average for the district. In the case of more than one district, the more restrictive setback will be used for computing the average.

⁴ As a committee we were not in agreement on the suggested wording. As a committee, we felt this needs greater study as to how to strike the right balance between clarity and the desired result of preserving established block faces.

§ 66.231. - Density and dimensional standards table (h)

Support the side yard reduction for one-family for RM2 and the reduction in distance between buildings from 12 feet to 10 feet to align with State building code.

Several suggestions for better clarity and to prevent unintended consequences.

The use of footnotes for important and even fundamental components of zoning code is not ideal. We, generally speaking, would like to see footnotes used more sparingly, made more clear, and limited to one topic per footnote. AS noted earlier, we appreciated the bulleted sections in the proposed changes to footnote (f) as a clear and accessible manner to break down a complex topic. We have attempted to use this as a model in our suggestions. Footnote (h) is notably dense with several topics, and would greatly benefit from bulleted, hierarchical presentation.

We have added topics (in italics) and numbering to help break up the several

- (b) *Adjustments to Sideyard setbacks:*
 - (1) *Townhouse Setbacks:* Side yards are required only for dwelling units on the ends of townhouse structures. ~~When two (2) or more one-family, two-family, or townhouse structures are constructed on a single parcel, there shall be a distance of at least twelve (12) feet between principal buildings.~~
 - (2) *One-family Dwelling Setbacks:* ~~For one-family dwellings in RM1 and RM2 districts, the minimum side yard setback shall be four (4) feet, for buildings of thirty-five (35) feet height or less.~~⁵
 - (3) *Two family Dwelling Setbacks* For two-family and multifamily dwellings in RM1 and RM2 districts on lots of sixty (60) feet width or narrower, the minimum side yard setback is reduced to six (6) feet for buildings of thirty-five (35) feet height or less.
 - (4) *Common Wall Setbacks:* side yard setback requirement from interior lot lines may be reduced or waived when an easement or common wall agreement, certified by the city building official for conformance with the state building code, is recorded on the deeds of the adjoining parcels.

...

⁵ It might be easier to revert to the previous standard, i.e. use "R4" for single family and "RT1" (duplex) standards for those building types in RM districts. It was more direct and therefore simpler. It also has the benefit that is those numbers are likely to be adjusted in Phase 2, it would then automatically adjust the footnote as well. The big differences: (1) RM2 and RM1 do not have the 35% lot coverage limit. Instead they use FAR, which is too abstract and complicated to be readily understood by a lay person. There is also a potential unintended consequence with height limits. The height limits are higher (50 ft RM2; and 40 feet RM1; vs 30 ft R4) (3) rear setbacks are less for RM2 (9 feet instead of 25). The way this is written, a 1-family or 2-family building could be build to RM3 standards – 50 feet tall and with 9 foot rear setbacks. Also could potentially allow several 50 feet tall one family houses with 4 foot setbacks, due to new changes. While this is, hopefully, an unlikely scenario, its possibility is not likely an intended consequence.

Wade, Michael (CI-StPaul)

From: David Heberlein <davidheberlein@gmail.com>
Sent: Tuesday, October 19, 2021 9:00 AM
To: *CI-StPaul_1to4HousingStudy
Subject: Re: 1-4 unit infill housing study

I'm sorry. I forgot to include the address.

David and Judy Heberlein
78 10th Street East, Unit 2502
St. Paul, MN 55101

On Tue, Oct 19, 2021 at 8:56 AM *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us> wrote:

Hello,

My apologies. In order for your comment to be entered into the public record we'll need your home address. Thanks!

Michael Wade

City Planner || Saint Paul Planning & Economic Development || 651-266-8703

From: *CI-StPaul_1to4HousingStudy
Sent: Monday, October 18, 2021 1:53 PM
To: 'David Heberlein' <davidheberlein@gmail.com>
Subject: RE: 1-4 unit infill housing study

Hello,

Thank you for your contribution to the public record! Your email will be forwarded to the Planning Commission as they consider the proposed Phase 1 amendments and public comment.

Best,

Michael Wade

City Planner

Pronouns: he/him/his

Department of Planning and Economic Development (PED)

1400 City Hall Annex, 25 W 4th Street

Saint Paul, MN 55102

P: 651-266-8703

Michael.Wade@stpaul.gov

www.StPaul.gov



SAINT PAUL
MINNESOTA

From: David Heberlein <davidheberlein@gmail.com>
Sent: Monday, October 18, 2021 1:32 PM
To: *CI-StPaul_1to4HousingStudy <1to4HousingStudy@ci.stpaul.mn.us>
Subject: 1-4 unit infill housing study

Hi,

We are residents of St. Paul. Since only 48% of the city's land area can be used for duplex, triplex and fourplex, we believe allowing additional units of this type AND Accessory Dwelling Units (ADU) is a simple way of supplying more housing options to current and future residents.

Please stop studying and start acting! This is a dire crisis for our city. We hope you put your words into actions ASAP.

Thanks for listening. Good luck.

Sincerely,

Judy and David Heberlein

From: [Jessa Anderson-Reitz](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: Zoning Comments
Date: Monday, October 18, 2021 3:17:16 PM

Hello,

My name is Jessa Anderson-Reitz and I live at 1423 Eleanor Avenue, Saint Paul, MN 55116.

I support the Zoning Code amendments that the Saint Paul City staff have recommended for Phase One of the 1-4 unit infill study. They will make it modestly easier to construct more housing throughout the city.

However, the changes outlined in the amendments are low-hanging fruit, and they do not go far enough. Saint Paul has a severe housing crisis, and it's time for bigger, bolder solutions, such as to:

Eliminate the owner occupancy requirements for ADUs, end single family zoning and legalize Missing Middle Housing throughout the city, and institute an inclusionary zoning ordinance

Thank you for your time and attention.

Sincerely,
Jessa Anderson-Reitz

From: [Kimberly S](#)
To: [*CI-StPaul_1to4HousingStudy](#)
Subject: A comment from the public!
Date: Monday, October 18, 2021 12:40:22 PM

Hello St Paul Planning Commission,

This email is my comment to the Housing Study – Phase 1 portion of the 10/15/2021 Planning Commission meeting I attended virtually. I did not get an opportunity to raise my hand and comment, so I wanted to provide written comments. They are:

1. I support **eliminating the owner-occupy requirement** regarding ADUs.
2. In the future, where would I find the link/email address to send email comments – I had to do a lot of searching to find where to send this comment before 4:30 pm today. Hopefully you get this!!

Thank you for your time on the commission!
Kimberly

Kimberly Sannes PE

290 Dayton Ave

St Paul, MN 55102

218.260.9017

kimmymailbox@gmail.com