

## Property owner response:

- All vehicles have been moved to an approved surface.
- I am not "operating a vehicle repair and/or sales business from the property."

All vehicles were and are:

- operational
- secured from entry within a full perimeter 6-foot fence
- not missing vital parts (headlights and aesthetic plastic bumper covers are not vital parts)

Taken in order directly from the the correction notice, it is stated that per SPLC 34.08, all vehicles must:

- be correctly licensed,
- operable,
- secure from unauthorized entry,
- parked on an improved surface,
- have current tabs,
- registered to the property,
- fully operational,
- have all vital parts,
- not be open to entry, and
- non-compliant vehicles must be stored within a garage or removed from the property.

SPLC 34.08 addresses approved parking surface materials only, not the numerous deficiencies the correction notice states are existing on my property. Additionally, footnote 1 in the order does not link to Saint Paul Legislative Code 34.

Please see the following attachments:

1. City of Saint Paul Correction Notice dated December 12, 2024, to Jennifer Adams
2. Images of perimeter fencing at 2147 Minnehaha Avenue East
3. Saint Paul Legislative Code (SPLC) Chapter 34.08  
Saint Paul Legislative Code (SPLC) Chapter 163.01  
Minnesota State Statute 168.10  
Bumper cover definition with Minnesota State Statute 169.48 about headlight requirements (non-vital parts)
4. Screen shots of incorrect web-page noted in Correction Notice- footnote 1
5. Suggestions for professional correspondence

# 2147 Minnehaha Avenue East

**Front**

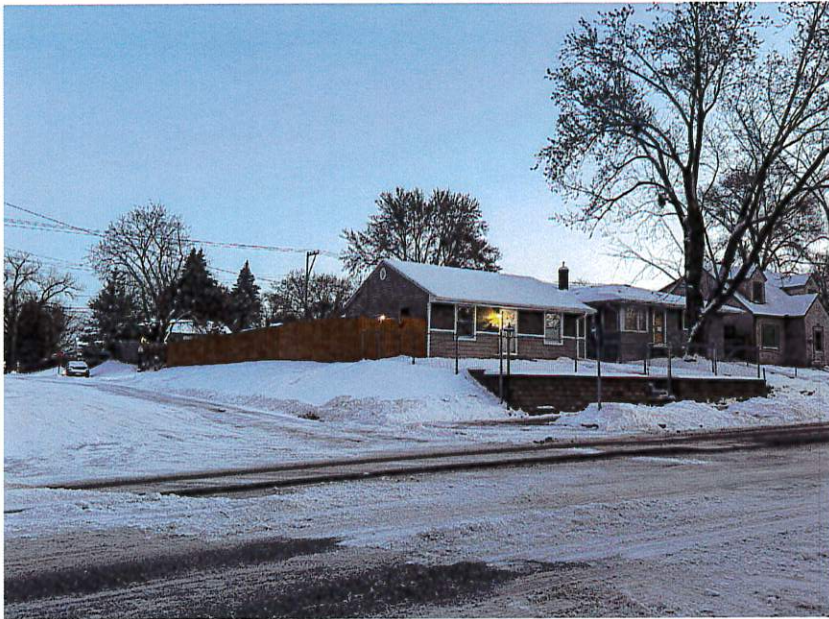


**Rear Alley**



# Side street view

**Northbound view**



**Southbound view**



# Full perimeter privacy fence with sliding gate operator in alley

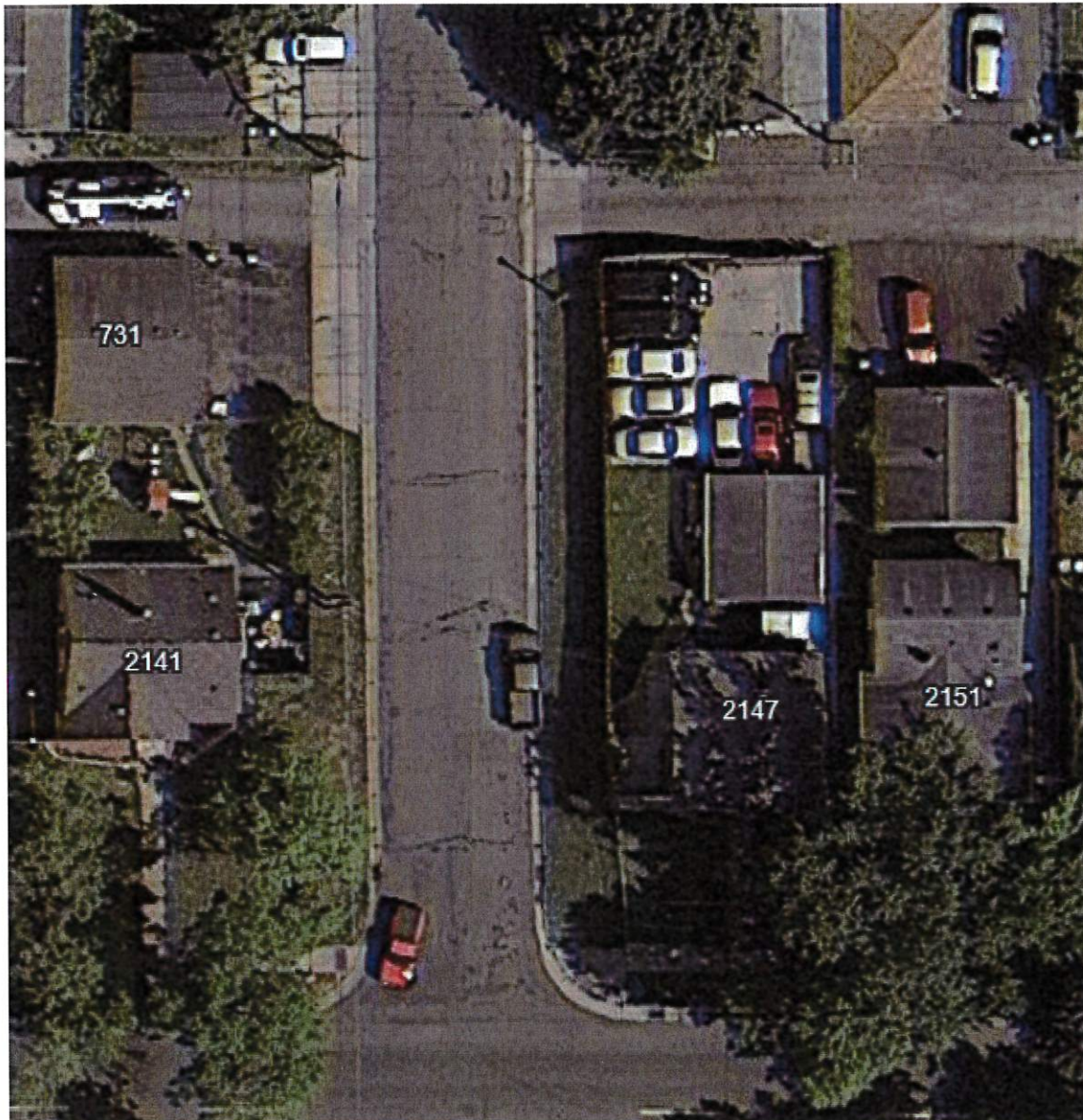
(12'+ height - street elevation to top of fence)



# Plates with current tabs



Aerial view



## Securement from unauthorized entry

Rear slide gate with operator and Multi-Code One-Channel Remote Control Transmitter:



### Slide Gate Openers and Operators

Both residential and commercial properties today can be found with **slide gates** as a part of their **perimeter security**. These entry points can be much easier to manage if you equip your slide gate with an appropriate slide gate opener. These machines can get rid of the need to have a security team or property owner manually open and close a gate any time someone enters or exits the property. Now, **gates can be opened for entry** and **securely locked again** with the push of a button.

([https://allsecurityequipment.com/collections/gate-openers-and-operators-all-gate-operators-slide-gate-openers-and-operators?view=products#/pfilter:vendor:Linear/pfilter:ss\\_cat\\_gateoperators:Slide\\$2520Gate\\$2520Openers\\$2520and\\$2520Operators](https://allsecurityequipment.com/collections/gate-openers-and-operators-all-gate-operators-slide-gate-openers-and-operators?view=products#/pfilter:vendor:Linear/pfilter:ss_cat_gateoperators:Slide$2520Gate$2520Openers$2520and$2520Operators))

## **Saint Paul Chapter 157. - General Parking Restrictions**

- **Sec. 157.07. - Duty to lock ignition, remove key.**

(a) Every person when leaving a motor vehicle, except a commercial motor vehicle, unattended on any street, alley, or parking lot in the city shall **lock the ignition**, remove the key and take it with him or her. Any violation of these provisions shall not (1) mitigate the offense of stealing such motor vehicle, nor (2) be used to affect a recovery in any civil action for theft of such motor vehicle, or the insurance thereon, or (3) have any other bearing in any civil action.

(b) Any police officer who finds a motor vehicle standing in violation of the foregoing provisions, is authorized and directed to remove the keys and to deliver them to the desk officer at the city's central police station.

(Ord. No. 11-84, § 1, 9-28-11)

# Side street parking prior to 11-30-23



# Side street parking after 11-30-23



**Sec. 34.08. Exterior property areas on residential properties.**

The owner of any premises or structure regulated by this section, as specified in section 34.03, shall comply with the following requirements:

- (1) *Sanitation.* ..... All exterior property areas shall be maintained in a clean, safe and sanitary condition, free from any accumulation of garbage, mixed municipal solid waste, animal feces or refuse.
- (2) *Grading and drainage.* All premises shall be graded and maintained so as to drain water away from structures and minimize the accumulation of water on such premises.
- (3) *Ground cover.* Every residential premises shall be maintained in a condition to control erosion, dust and mud by suitable landscaping with grass, trees, shrubs or other planted ground cover, or by suitable paving or by other means as shall be approved by the enforcement officer.
- (4) *Insect and rodent infestations.* It shall be the responsibility of the owner to control and/or eliminate any infestation of insects, rodents or other pests in all exterior areas and accessory structures on the premises.
- (5) *Accessory structures.* All accessory structures including, but not limited to, detached garages, sheds and fences, shall be kept in a professional state of maintenance and repair and maintained structurally sound. All exterior wood surfaces, other than decay-resistant woods, shall be protected from the elements and decay by paint which is not lead-based paint or by other protective covering or treatment. Service doors to accessory structures shall be provided with securing locks.
- (6) *Stored materials.* It shall be unlawful to accumulate and store building material, lumber, boxes, cartons, portable storage containers, inter modal cargo containers or other containers, machinery, scrap metal, junk, raw material, or fabricated goods.
- (7) *Parked or stored vehicles.* All existing parking spaces shall consist of asphalt, concrete, gravel, rock, or other durable and dustless surfaces. Existing parking surfaces must be maintained in a professional state of repair and may be maintained with like materials without additional approval from the city. Existing parking surfaces must be contained to eliminate migration onto other adjacent surfaces and must be clearly delineated. In all residential districts, off street parking shall not be located within any front yard or non-interior side yard. Before any existing parking spaces or driveways may be expanded upon, site plan approval must be obtained as specified in the Saint Paul Zoning Code and the lot must be developed in conformance with such approval.
- (8) *Refrigerators and accessible containers.* It shall be unlawful to permit a refrigerator or other container, sufficiently large to retain a child and with doors which fasten automatically when closed, to be exposed and accessible to children without removing the doors, lids, hinges or latches.
- (9) *Exterior lighting.* Exterior lighting at garages and surface parking areas of buildings containing three (3) or more dwelling units shall be illuminated to a level to allow safe, secure access to the parking facility and within it. Exterior lighting shall be in conformance with city ordinances and codes.
- (10) *Exterior sidewalks, walkways and stairs.* All sidewalks, walkways and exterior stairs shall be maintained in a professional state of maintenance and repair, free of defects and hazards.
- (11) *Outdoor swimming pools.* All outdoor swimming pools, in use or temporarily out of use, shall be maintained and secured as defined in section 34.08(12).
  - a. Out-of-service outdoor swimming pool. Any outdoor swimming pool not in use for more than one (1) year shall be free of stagnant water, free of debris, and secured as defined in section 34.08(12).

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- b. Nuisance outdoor swimming pool. Any outdoor swimming pool that has stagnant water, lacks maintenance such as damaged slides, broken ladders, missing or damaged equipment, or is out of service for two (2) years, and/or is not secured as defined in section 34.08(12) is subject to abatement under chapter 45 of the St. Paul Municipal Code.

(12) *Outdoor swimming pool fencing.*

- a. All yards of one- and two-family structures containing outdoor swimming pools shall be enclosed by an obscuring fence or wall not less than four (4) feet in height, maintained in a professional state of maintenance or repair, and shall be constructed such that no openings, holes or gaps in the fence or wall exceed four (4) inches in any dimension except for openings protected by a door or gate. All yards of residential structures of three (3) or more units and commercial structures containing outdoor swimming pools shall be enclosed by an obscuring fence not less than five (5) feet in height, maintained in a professional state of maintenance or repair, and shall be constructed such that no openings, holes or gaps in the fence or wall exceed four (4) inches in any dimension except for openings protected by a door or gate. Sidewalls greater than four (4) or five (5) feet in height on an above ground outdoor swimming pool are not a substitute for the appropriate fence or wall. The gates shall be of a self-closing and self-latching type, with the latch on the inside of the gate, not readily available for children to open. Gates shall be capable of being securely locked when the outdoor swimming pool is not in use.

(C.F. No. 05-740, § 1, 9-14-05; C.F. No. 09-137, § 1, 2-25-09; Ord 15-49, § 1, 10-14-15; Ord 16-58, § 1, 1-4-17)

## **Saint Paul Chapter 163. - Abandoned Vehicles**

### **• Sec. 163.01. - Definitions.**

The following definitions and terms shall apply in the interpretation and enforcement of the chapter:

(1) *Disabled*. For the purposes of this chapter, "disabled" means partially or completely dismantled or appearing either to be undrivable or to be lacking any of those parts of a motor vehicle which are essential to the functioning of the vehicle, including, but not limited to, the motor, drive train and wheels.

(2) Abandoned *motor vehicle*. "Abandoned motor vehicle" means a motor vehicle, as defined in Minnesota State Statutes, Section 169.011, which has been voluntarily surrendered by its owner to the City of Saint Paul or to a person duly licensed under Minnesota Statutes, Section 168B.09 or which has remained for more than forty-eight (48) hours in a condition described by one of the following:

- a. On public property in violation of either the Saint Paul Legislative Code or Minnesota Statutes;
- b. On private property without consent of the person in control of the property;
- c. Disabled;
- d. Not secure from entry;
- e. Without license plates properly displayed thereon; or
- f. With license plates which have an expiration date more than ninety (90) days prior to the date of inspection.

(3) Abandoned *motor vehicle—Exemptions*. For the purposes of this chapter, the following vehicles shall not be considered abandoned motor vehicles:

- a. A classic or pioneer car, as defined in Minnesota Statutes, Section 168.10; provided, that it is kept secure and as long as it has substantial potential further use consistent with its usual functions;
- b. Vehicles on the premises of a motor vehicle and parts dealer, junkyard, junk dealer, motor vehicle salvage dealer, automobile repair garage, or body shop who is licensed under Chapters 401, 408, 422, or 423 of the Saint Paul Legislative Code;
- c. A vehicle kept inside an enclosed garage or storage building;
- d. A vehicle which is registered to the owner or occupant of the property and which is being kept for repair on the property; provided, that the vehicle is kept for no longer than thirty (30) days in a disabled condition and is kept secure from entry; and provided, that only one disabled vehicle may be kept on the property at any given time.

(Code 1956, § 467.01; Ord. No. 17377, § 1, 7-29-86; Ord. No. 11-90, § 1, 9-28-11)

## Mn Statute 168.10 REGISTRATION; COLLECTOR VEHICLE.

Subd. 1c. **Collector's vehicle**, collector plate.

(a) The owner of any self-propelled motor vehicle, including any truck, (1) that is (i) at least 20 model years old, or (ii) at least ten model years old and with a body or engine style of which not more than 500 were manufactured in or imported into the United States in any model year, (2) that was manufactured after 1935, and (3) that is owned and operated solely as a collector's vehicle, shall list the vehicle for taxation and registration as provided in paragraph (b).Subd.

### 1e. **Outdoor storage.**

Pioneer, classic, collector vehicles, collector military vehicles, or street rods, licensed or unlicensed, operable or inoperable, may be stored in compliance with local government zoning and ordinances on their owners' property, provided that the vehicles and any outdoor storage areas they may require are maintained in such a manner that they do not constitute a health or environmental hazard and are screened from ordinary public view by means of a fence, shrubbery, rapidly growing trees or other appropriate means. The appropriate local agency or authority may inform an owner of the owner's failure to comply with these requirements, and may order the vehicles removed from the outdoor storage area if the owner fails to comply with these requirements within 20 days after the warning.

# Disabled Vehicle\*

\*Bumper covers & daytime headlights are not essential to the functioning of a vehicle

## Bumper Cover vs. Bumper: What's the Difference?



Reviewed by

Lisa Conant, Automotive Content Specialist

Automotive Features Reviewer at CarParts.com

Written by CarParts.com Research Team - Updated on December 10th, 2024

### Summary

- The bumper and bumper cover differ in function, protective features, and materials.
- The bumper absorbs impact whenever there's a front-end collision, while the bumper cover is the part that serves as an aesthetic fitting over the actual bumper.
- Bumpers are replaced for safety, while bumper covers are replaced for aesthetic purposes.

## Headlights (only required at night & during bad weather)

### 2024 Minnesota Statutes

#### 169.48 VEHICLE LIGHTING.

Subdivision 1. **Lights to be displayed.** (a) Every vehicle upon a highway within this state:

- (1) at any time from sunset to sunrise;
- (2) at any time when it is raining, snowing, sleeting, or hailing; and

(3) at any other time when visibility is impaired by weather, smoke, fog or other conditions or there is not sufficient light to render clearly discernible persons and vehicles on the highway at a distance of 500 feet ahead;

shall display lighted headlamps, lighted tail lamps, and illuminating devices, as hereinafter, respectively, required for different classes of vehicles, subject to exceptions with respect to parked vehicles and law enforcement vehicles, as hereinafter stated. In addition to the other requirements of this paragraph, every school bus transporting children upon a highway within this state, at any time from a half hour before sunrise to a half hour after sunset, shall display lighted headlamps, lighted tail lamps, and illuminating devices as required by this paragraph, except that the operator shall use the lowermost distribution of light specified in section [169.60](#) unless conditions warrant otherwise.

(b) When requirement is hereinafter declared as to the distance from which certain lamps and devices shall render objects visible or within which such lamps or devices shall be visible, these provisions shall apply during the time stated in this section upon a straight level unlighted highway under normal atmospheric conditions unless a different time or condition is expressly stated and unless otherwise specified the location of lamps and devices shall refer to the center of such lamps or devices. Parking lamps shall not be used in lieu of headlamps to satisfy the requirements of this section.

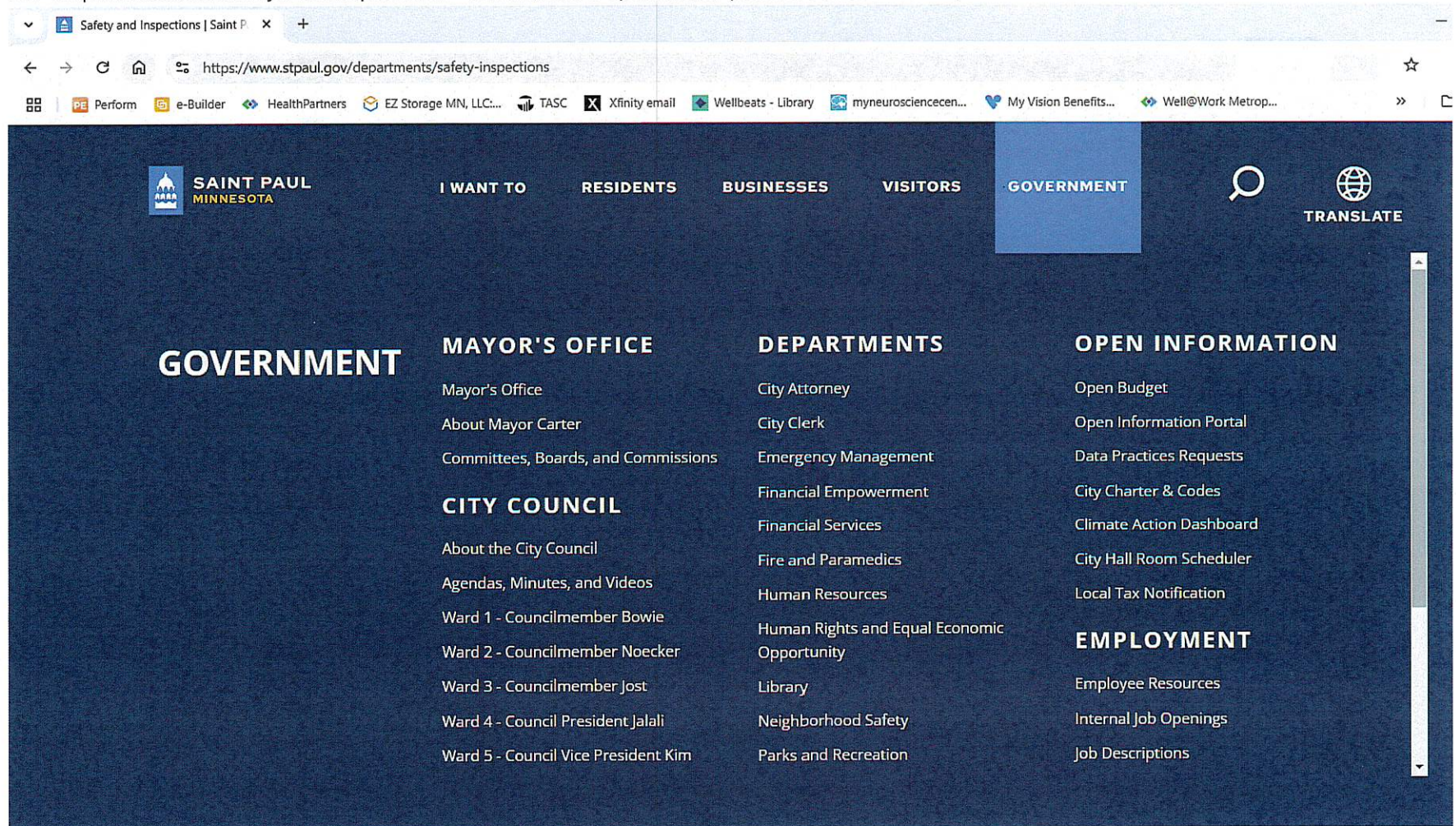
Subd. 2. **Certain violations; negligence.** Notwithstanding section [169.96](#), a violation of subdivision 1, paragraph (a), clause (2), is not negligence per se or prima facie evidence of negligence.

**History:** ([2720-234](#)) [1937 c 464 s 84](#); [1967 c 218 s 1](#); [1974 c 134 s 1](#); [1990 c 482 s 1](#); [1990 c 555 s 8](#); [2003 c 45 s 1](#)

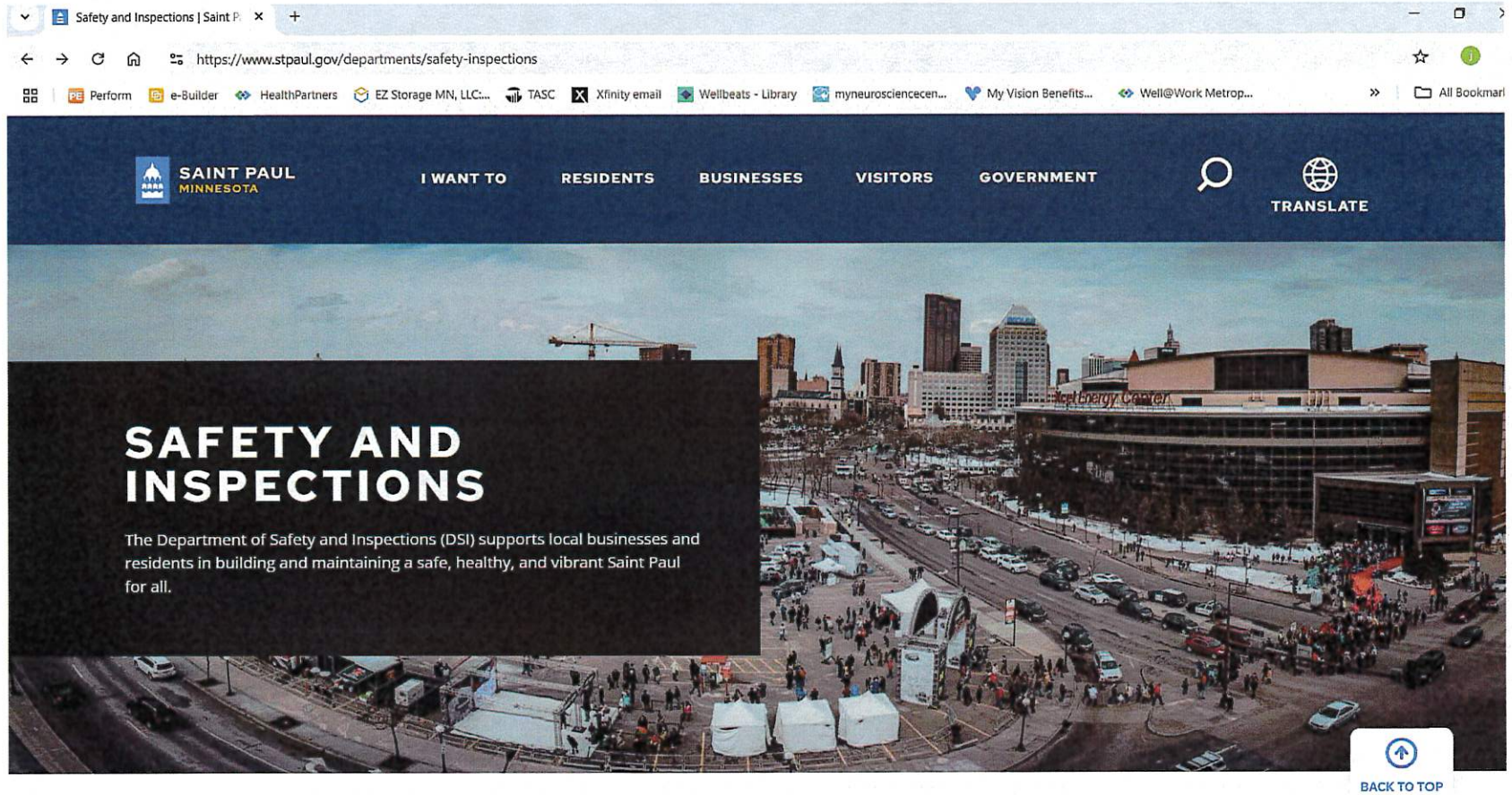
## Footnote 1 –

Directions to find violation of the Saint Paul Legislative code (inaccurate/not existent on webpage)

No “Department.of.Safety.and.Inspections” listed under Departments (see screen shot below):



Scrolling down on the Department of safety and Inspections page does not provide »Codes« (see screen shot of webpage scroll below):





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## IN THIS SECTION

ANIMAL CONTROL

BUILDING AND CONSTRUCTION

OPEN, OPERATE, EXPAND A BUSINESS

PLAN AN EVENT

RENT, BUY, SELL PROPERTY

REPORT A CONCERN



## WHO WE ARE

DSI is a multi-disciplinary regulatory organization that works to promote safety and wellness where we live and work, prevent life and property loss, support neighborhood vitality, and promote equitable, innovative and sustainable solutions that work for all.



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## WHAT WE DO

Each year, the department certifies more than 4,000 residential and commercial buildings are safe and habitable; processes more than 32,000 permits; and issues more than 200 types of business licenses. Animal Services provides care for more than 2,000 dogs, cats, and critters at the City's shelter annually. DSI also oversees the City's Information line, ensuring an average of 80,000 customers each year get their questions and concerns resolved.





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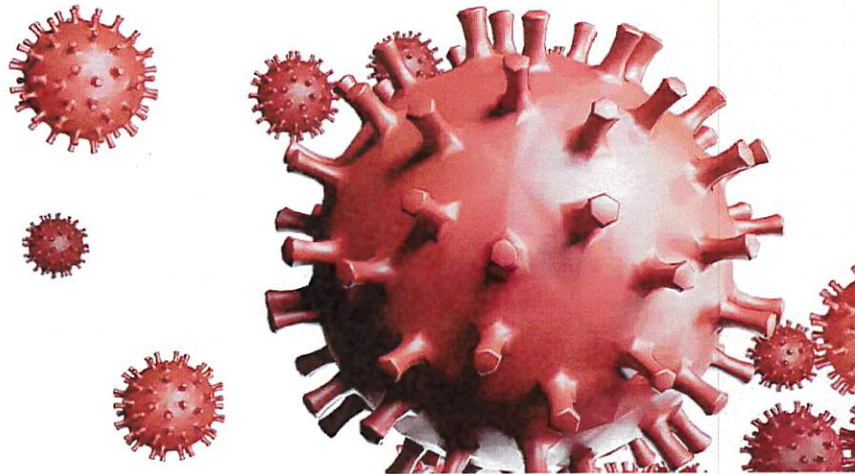
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DSI SERVICES 



## COVID RESPONSE

Protecting public health and safety is a priority for the City of Saint Paul as we have worked with our staff to minimize the spread of COVID-19. The Department of Safety and Inspections continues to create new ways to serve in alignment with public health guidance throughout all phases of the pandemic.



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MORE INFORMATION

# HOW CAN WE HELP YOU?

A guide to frequently requested services and information.

HELP

FAQ

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Saint Paul Online Services

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PAY MY BILL

PROPERTY  
SEARCH

[View](#) | [Si Prepublish](#) | [Si Recheck](#)

Last Edited: December 9, 2024



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# Contact Us

**Angie Wiese, PE (MN), CBO**  
DSI Director

## Address

375 Jackson Street, Suite 220  
Saint Paul, MN 55101

## General Information

Phone: 651-266-8989  
Fax: 651-266-9124

## Website

[Safety and Inspections \(DSI\)](#) | [Saint Paul Minnesota \(stpaul.gov\)](#)

## Hours

7:30 am - 4:30 pm Monday - Friday  
9:00 am - 4:30 pm the first Tuesday of every month

## Customer Lobby Hours

8:00 am - 4:00 pm Monday - Friday  
9:00 am - 4:00 pm the first Tuesday of every month



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## CONTACT THE CITY

### Email Us

Contact the City's Call Center by sending an email. For non-emergency information. Available weekdays, 7:30 a.m. - 4:30 p.m.

### Call 651-266-8989



Home | Translate Website | Website Policies | Local Tax Notification | Photo Credits  
15 Kellogg Blvd. West | Saint Paul, MN 55102 | General Information: 651-266-8989



**Suggestions for professional correspondence:**

Correction notices should include clear, specific, and accurate code violations with current web address links to references or printed copies. Photos of violations would be ideal for clarification. The current link for the Saint Paul Legislative Code is below:

[https://library.municode.com/mn/st.\\_paul/codes/code\\_of\\_ordinances?nodeid=PTICICH](https://library.municode.com/mn/st._paul/codes/code_of_ordinances?nodeid=PTICICH)

A correction notice of "fully operational" should be removed and instead referred to as "operable with all vital parts," as the language fully operational is not stated in any code I've found. Many cars have inoperable components such as power windows, air conditioning, auto-starts, and other non-vital parts. Stating "fully operational" as a requirement is embellishing the definition of a disabled vehicle per Saint Paul Chapter 163.01.1

A correction notice stating vehicles must have "current tabs" is only applicable per SPLC 163.01.f if the license plate tabs *"have an expiration date more than ninety (90) days prior to the date of inspection."* A correction notice stating vehicles on private property must have "current tabs" is not accurate if the tabs are not more than 90 days overdue or the vehicle is exempt per SPLC 163.01.3.a.

A vehicle correction notice should not state vehicle deficiencies will be reinspected by the enforcement officer on or after a twelve (12) day period. Noting that a failure to correct vehicle deficiencies within twelve (12) days may result in an abatement and/or additional fees for re-inspection, is contrary to SPLC 163.01.3.d which provides a thirty (30) day correction period.

A correction notice stating vehicles need to be "garaged or removed from the property if they are missing vital parts, inoperable, without current tabs, unregistered to property, open to entry, or licensed" should be removed when the vehicle is exempt per SPLC 163.01.3.a and Minnesota State Statute 168.10. Per Minnesota Statute 168.10, *"The owner of any self-propelled motor vehicle...at least 20 model years old...licensed or unlicensed, operable or inoperable, may be stored in...any outdoor storage areas...screened from ordinary public view by means of a fence." 2006 and older vehicles are not required to be garaged and may be stored outdoors.*