



November 6, 2013

Saint Paul City Council
390 City Hall
15 West Kellogg Boulevard
Saint Paul, MN 55102

RE: Urban Agriculture Zoning Study

St. Paul City Council Members:

Thank you for the opportunity to comment on the recently drafted Urban Agriculture Zoning Study. In seeking to clarify agricultural zoning Saint Paul will progress toward addressing 21st century concerns for accessing locally grown food. We appreciate the work and effort of many dedicated neighbors who diligently drafted the amendments. Thank you for making this possible.

As you may recall from our previous interactions, Gardening Matters grows community across the metropolitan area through a network of thousands of gardeners and hundreds of community gardens. Within the St. Paul city limits there are at least eighty community gardens that have registered with Gardening Matters. Stakeholders of this constituency have had mostly positive comments on the recommended amendments. However there are several items in the Urban Agriculture Zoning Study that would affect our St. Paul community gardeners.

Sec. 61.302 (b) (3) "Conditional use permit: Eight Hundred dollars (\$800.00) up to one (1) acre of land"

This would be a steep fee increase for currently existing gardens. It would be unfortunate for established community gardens to close for their inability to reach this higher cost. We request consideration for grandfathering gardens larger than one acre.

Sec. 65.771 (f) "Any tools, equipment, and material shall be stored and concealed within an enclosed, secured structure."

This recommendation will be a problematic item in practice. Many community gardens have been fundraising for a shed for years. Some established gardens are fortunate enough to have a storage containers or sheds but gardens without budgets (and newer gardens) serving communities of lesser means cannot afford this requirement.

Sec 65.771 (i) "Accessory buildings shall not exceed an area greater than ten (10) percent of the parcel or one thousand (1000) square feet, whichever is greater. Temporary structures, not exceeding one hundred eighty (180) days per year, such as hoophouses, cold frames, and similar structures located above gardening plots and being used to extend the growing season are permitted. A building permit is required for any temporary structure covering an area greater than one hundred twenty (120) square feet."

Extending use to 240 days would allow gardeners to extend food production earlier and later into the season. Additionally, the building permit requirement for a structure of more than 120 square feet may create undue hardship for gardeners, especially if structures have dual purpose in the growing season, when uncovered. We propose limiting hoophouses to 30 feet in length opposed to a square foot limitation. We also ask for greater policy congruence between Saint Paul and Minneapolis language.

Sec. 65.771 (k) "One identification sign is permitted, not to exceed six (6) square feet."

Limiting signage can be prohibitive as there are many community garden signs that have been commissioned as public art that are larger than six square feet. We would like to see variances granted and grandfathering of larger signs.

We appreciate your attention to these concerns as well as all the steps in the right direction the recommendations make toward healthy food access. We look forward to working with you to insure greater equity in access in Saint Paul. Thank you, for your commitment the gardeners across St. Paul.

Growing Community,

A handwritten signature in black ink that reads "Jeremiah Ellis".

Jeremiah Ellis
Executive Director

A handwritten signature in black ink that reads "Dan Halsey".

Dan Halsey
Board President



Promoting and Preserving Community Gardening Across the Twin Cities
310 E. 38th St. #204B Minneapolis, MN 55409 www.gardeningmatters.org