

Remarks about ADUs for the City Council Meeting, June 15, 2016, 5:30pm

By David Fan, 21xx Hoyt Ave W, St. Paul, MN

I am presenting these remarks verbally at the meeting. However, I am emailing the City Council a copy of the remarks because they include links to websites with data that I cite.

I support the District 12 Task Force recommendation that permits internal or attached ADUs but not detached ADUs. My opposition to detached ADUs is based on their non-affordability, on their energy inefficiency, on the difficulty of their conversion, and on enforcement issues. I will now consider each reason in more detail.

Reason 1 is non-affordability. A nationwide survey by the National Association of Home Builders gives an average construction cost nationwide of \$100 per square foot for 2014¹. In the same year, the State of Oregon's Department of Environmental Quality's survey of builders in Portland, Oregon gives a figure that is about one and a half times as great at \$145² per square foot for detached ADUs. If Portland is similar to the country at large, the construction costs of detached ADUs are about one and half times higher than market rate and are hence non-affordable.

A cause for the non-affordability is fixed costs that do not decrease with unit size. An example is the Minnesota State Plumbing Code mandate that detached ADUs need separate water and sewer lines.

Reason 2 is energy inefficiency. One touted goal of ADUs is to decrease the City's carbon footprint. Unfortunately, detached ADUs are energy inefficient because heat loss from any structure occurs at the surface. Small, free-standing buildings like ADUs have large surface areas relative to the space they enclose. The heat loss problem is especially severe in our northern climate.

Reason 3 is lack of convertibility. An internal or attached ADU can easily be converted to give additional living space for the main residence by, say, adding a door. In contrast, there is no way to get to and from a detached ADU without going into the cold outside.

Reason 4 is enforcement issues. One condition of the ADU proposal is that the owner should live on the property as a permanent and principal resident. I attended a St. Paul Comprehensive Planning Committee meeting and a subsequent Planning Commission meeting at which enforcement was discussed. At both meetings, it was acknowledged that this and other enforcement issues would be problematic.

¹ Based on actual values of \$95 for 2013 and \$103 for 2015 from Page 4, "Construction Costs," <https://www.nahbclassic.org/generic.aspx?genericContentID=248306>.

² Page 31, third paragraph under "Construction costs and benefits", <http://www.deq.state.or.us/lq/sw/docs/SpaceEfficient/adusurveyinterpret.pdf>.

Given these arguments based on non-affordability, on energy inefficiency, on the difficulty of conversion, and on enforcement issues, I suggest that the City should consider these actions for ADUs.

Suggestion 1 is that the City should delay any actions on ADUs until enforcement issues have been resolved in a robust and workable way.

Suggestion 2 is that the City should amend the ADU proposal to allow for internal and attached ADUs but to disallow detached ADUs as is recommended by the District 12 Task Force on ADUs

Thank you very much.