

From: Mike and Benita

Sent: Wednesday, June 15, 2016 1:24 PM

To: #CI-StPaul_Ward4; #CI-StPaul_Ward1; #CI-StPaul_Ward7

Cc: #CI-StPaul_Ward2; #CI-StPaul_Ward3; #CI-StPaul_Ward5; #CI-StPaul_Ward6

Subject: June 15, 2016 Public Hearing on Accessory Dwellings

Importance: High

Please add this email to the official record of Item 17, Ord 16-13, June 15, 2016 St. Paul City Council Public Hearing on Accessory Dwellings.

I wish to go on record as opposed to changing zoning within ½ mile of the Green Line to allow accessory dwellings. My reasons are as follows:

What happens when a property with an accessory dwelling is sold? There is nothing in these recommendations that requires an occupancy permit for the unit that would expire upon transfer to a new owner. Nothing would prevent an investor from purchasing a property that has been converted to include an accessory dwelling and then renting out both units. The way this is written, there is no way to ensure that at least one unit is owner occupied by a subsequent owner of the property. In effect, this can open the door to create de-facto duplexes in areas currently zoned for single family dwellings.

What happens when a significant percentage of the properties on a block add accessory units? The likelihood is that each new accessory unit will create demand for one more parking space. Blocks close to the Green Line are already experiencing a tight parking supply. Adding several new accessory units to such blocks could push the parking demand to the point where residents will push for permit parking to ensure that they can continue to park near their homes. Just because the Green Line is close doesn't guarantee that the residents of the new units will use transit rather than drive. Since seniors are one of the main demographic groups that accessory units are supposed to house, and many in that group have mobility issues, expecting those people to use transit is not reasonable.

Another consequence of limiting accessory dwellings to the area in close proximity to the Green Line is how it could contribute to an increase in the concentration of poverty in the Frogtown and Aurora-St. Anthony neighborhoods. According to the introduction to this study, "From the perspective of a low or moderate-income person, ADUs can provide an alternative to renting an apartment in a multifamily building or buying (or renting) a single-family home (both of which can be cost prohibitive)." In the interest of equity, the City should be working to add affordable housing to those neighborhoods where it is currently lacking rather than squeezing even more of it into an area that already has a concentration of lower-income households.

What happens when people who live in other neighborhoods in St. Paul, especially those affluent and lower crime areas like Macalester-Groveland, want to downsize and stay in their neighborhoods? According to the Introduction of this study, city-wide provisions for accessory dwellings "were proposed alongside the creation of the Traditional Neighborhood zoning districts. The ADU provisions were removed by the City Council in response to public testimony, particularly from residents in areas where large lots would have allowed for ADUs, such as along Summit Avenue and Mississippi River Boulevard..." It appears that residents of affluent areas view accessory dwellings as detrimental to their neighborhoods. If accessory dwellings were such a good idea, why are residents of St. Paul's affluent area so opposed? Is it fair for affluent areas to exclude such housing and then concentrate it in lower-income neighborhoods? The Green Line is not a good enough reason to justify this disparate treatment.

I would recommend the following changes to these rules:

Accessory units must be permitted city-wide.

Add rules to require occupancy permits for all accessory units, and these permits expire when the property is sold. A condition for occupancy must be that one unit must be owner-occupied.

All accessory dwellings must be required to pass inspection by the Department of Safety and Inspection, just like any other rental unit in St. Paul.

No more than two accessory units shall be permitted on any block face with 6 or more houses. No more than one accessory unit shall be permitted on blocks with less than 6 houses.

If we are going to allow accessory dwellings in St. Paul, they must be allowed city-wide, there must be a cap on how many are permitted per block, the newly-created units must be subject to inspections by DSI, and an occupancy certificate must expire upon sale of the property so any subsequent owners would need to reapply to meet the requirement for owner-occupancy.

Benita B. Warns