

Please add this email to the official record of Item 46, Ord 16-13, September 7, 2016 St. Paul City Council Public Hearing on Accessory Dwellings.

I support authorizing only a second kitchen in a single-family dwelling – an “internal ADU.” However, I oppose enlarging a single-family dwelling for the sole purpose of creating an ADU, and I categorically oppose detached ADUs.

I especially oppose either of these latter options in Summit-University. All of the neighborhoods near the Green Line are still absorbing the changes it created - changes in businesses along University Avenue, new construction that includes dramatically more housing, and commuter parking on their streets. Beyond these shared stressors, Summit-University, unlike the neighborhoods north of University and the less-residential neighborhoods west of Lexington, continues struggling to heal from the from the noisy, smelly, trashy I-94 gash slashed down the center of what the city now proposes to be part of its ADU experiment.

If the Council chooses nevertheless to authorize external or detached ADUs, I request that no permits be issued for either of these without the applicants' participation first in standard variance procedures, including written individual notice to the immediate neighbors and reasonable opportunity for them to be heard.

Additional discussion follows:

At best, ADUs create density and affordable housing by creating substandard duplexes. Code duplex lots are at least 50' wide and have 6,000 sq. feet in area. Code duplexes have at least three off-street parking places. In contrast, ADUs can be on lots of any width that are at least 5,000 sq. feet in size, and need only one off-street parking space. ADUs have 83% of a standard duplex lot and 33% of the parking spaces.

The presence of an owner on the premises does not compensate for the neighbors' physical losses of green space and parking that duplex requirements afford. To the extent that ADUs succeed, they succeed by degrading the neighborhood.

At worst, ADUs do not increase either affordability or density, and create burdensome enforcement issues for neighbors as well as the city.

ADUs do not increase affordability. The construction costs of ADUs that are created by additions or detached dwellings permanently increase the valuation of a property that was once affordable for one family, with corresponding ongoing increased property taxes and annual fees.

ADUs do not increase density. Since ADUs do not allow occupancy beyond what is already allowed in single-family residences, additional density can be accomplished only to the extent that the second kitchen/privacy partitioning induces occupancy by those already-allowed residents who wouldn't otherwise have moved in. However, when the owner moves out, no non-owner can replace him; the density must revert back to the pre-construction smaller household in a property that is no longer affordable for it.

ADUs create enforcement issues. Enforcing this occupancy reversion creates long-term expenses for the city that more than offset any immediate permit fees or long-term tax base gains.

My personal interest: I own two rental properties in the proposed ADU zone. One is a duplex with affordable rents that complies in every way with the city code requirements for duplexes. The other is a five-bedroom house, the internal beauty of which would be severely degraded by subdividing. On the other hand, I own a third property, just outside the zone on Dayton Avenue, that would make a perfect duplex, but the city opposed my lot width variance for it in 2009 on grounds that renters degrade neighborhoods.

Respectfully,
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