DEPARTMENT OF PLANNING &
ECONOMIC DEVELOPMENT
Dr. Bruce Corrie, Director

CITY OF SAINT PAUL
Melvin Carter, Mayor

25 West Fourth Street, Ste. 1400
Saint Paul, MN 55102

Telephone: 651-266-6700
Facsimile: 651-266-6549

To: Planning Commission

From: Comprehensive & Neighborhood Planning Committee

Date: May 24, 2018

RE: Zoning Study to Amend Locational Standard of Accessory Dwelling Units

On February 7, 2018, the City Council passed a resolution initiating a zoning study to consider amending the locational standard for accessory dwelling units (ADUs) to include five additional areas of the city—Mounds Park area of Dayton's Bluff and Planning Districts 1 (Eastview-Conway-Battlecreek-Highwood), 3 (West Side), 7 (Thomas Dale), and 9 (West Seventh). (See Attachment 1 to review the initiation resolution.) Originally the study was limited to the Mounds Park area, but four district councils requested to be included in the study when they learned an expansion of the use was proposed. When recommended changes were brought forward to the Planning Commission to release the study for public hearing on March 9, 2018, the Planning Commission directed staff to seek city-wide input into potential ordinance expansion.

The following report provides background on ADUs in Saint Paul, the planning context for the study, community outreach, public testimony, responses to community questions and public testimony, and zoning recommendations.

Background

On September 14, 2016, the City Council adopted Ordinance 16-13 establishing ADUs as a permitted use in the R1-RM2 and T1-T3 zoning districts within one-half mile of University Avenue between Emerald Street and Lexington Parkway, and creating Zoning Code § 65.913(a-g), which established use standards related to location, minimum lot size, number of units, compliance with other regulation, unit occupancy, unit size, access and entrances, parking, and ownership. As the original ADU zoning study related to allowing for transit supportive densities and housing choice along the Green Line, the Planning Commission recommendation to the City Council included the area within one-half mile of University Avenue east of Lexington Parkway to Marion Street, but that area was removed from the final ordinance adopted by the City Council.

Only one ADU has been established since the adoption of the ordinance. However, there has been interest expressed by homeowners who live in areas of the city where ADUs are not currently permitted.

Neighborhood Impacts from ADUs

The current ADU requirements were developed to minimize negative impact that are often cited by community members when discussing multifamily housing in single-family neighborhoods, which include the following:

- *Overcrowding of lot and increased parking demand:* The total occupancy of a principal unit and ADU are regulated the same as a one-family dwelling. Occupancy is limited to the number of people that would meet the definition of one household unit under § 60.207[1], the definition of family. As the occupancy is limited to that which a one-family dwelling could house, the addition of an ADU should not overcrowd the lot or require additional parking needs.
- *Absentee landlords:* The owner occupancy requirement was included to mitigate issues associated with landlords who do not live on the premises.
- *Neighborhood character:* Three requirements were established to help maintain the current esthetics of the neighborhood within which ADUs are likely to be developed. External stairs to upper floors are not allowed on the front of the structure, the height of the ADU cannot exceed that of the principal structure, and an ADU in a detached structure cannot exceed 800 sq. ft.

Planning Context

The Comprehensive Plan supports studying the potential of implementing accessory dwelling units throughout the city. Land Use Policy 1.6 states: "Explore the potential for accessory units in Established Neighborhoods." Established neighborhoods is a future land use category of the plan, and it guides the areas of the city that are predominated by residential uses. In addition, Housing Policy 2.17(b) states: "Explore via a zoning study, the potential for accessory units in existing neighborhoods" to support creativity in infill housing. In addition to citywide guidance, the District 1 Community Council's Community Plan, which was adopted as an addendum to the City's Comprehensive Plan, states: "Explore the potential for accessory dwelling units in all single-family residential zoning districts, including what impacts this would have on both the zoning districts and the community (H3.6)." District 7's draft neighborhood plan calls for ADUs to be permitted.

[1] One or two persons or parents, with their direct lineal decedents and their adopted or legally cared for children (and including the domestic employees thereof) together with not more than two persons not so related…and four or fewer persons living in such housekeeping unit shall be considered a separate family for the purposes of this code.

Community Outreach
Planning staff reached out to the executive directors of district councils and offered to meet with one of their committees or boards to discuss ADUs in Saint Paul. Staff met with eleven of the district councils to discuss the proposed expansion of ADUs. This included the following districts:

- District 1 Battle Creek
- District 3 West Side
- District 4 Dayton's Bluff
- District 5 Payne-Phalen
- District 6 North End
- District 9 Fort Road
- District 10 Como
- District 11 Hamline Midway
- District 12 St. Anthony Park
- District 13 Union Park
- District 14 Macalester Groveland

In addition, staff spoke with District 7 Thomas-Dale and District 15 Highland Park. Based on previous community outreach work with their liaison planner, District 7 said that a briefing on ADUs was unnecessary because they are well versed on the topic. District 15 asked staff to come to its May 15 meeting to discuss the topic.

Recurrent discussion points that came up during these meetings included:

- Plumbing code requirement for separate sewer and water connections to ADUs in accessory structures
- Application of sidewalk requirement from the street to ADUs in accessory structures
- Short-term rentals (e.g. AirBnB or VBRO) and ADUs
- Application of the Student Housing Neighborhood overlay district to ADUs
- Consideration of possible reduction of the minimum lot size requirement
- Concern over increased parking demands
- Clarification over who can live in an ADU

These items will be discussed in the analysis section of this report.

In addition to meeting with District Councils a series of questions were posted on Open Saint Paul, including:

1. Do you support ADUs throughout the City?
2. Please explain your position on allowing ADUs throughout the City.
3. Although this study focuses on the expansion of ADUs, are there other elements of the requirements listed above that you would like to see changed?

The input received through that forum were in support of expanding ADUs citywide; however, it should be noted that of the fourteen registered users that responded seven were from Saint Paul and seven reside outside of Saint Paul.

Finally, two community conversations were scheduled: one on April 17 at Arlington Hills Community Center and the second on April 19 at Newell Park. One community member from the Mayor's Advisory Committee on Aging (ACOA) attended the April 17 event and two community members and a member from ACOA attended on April 19. Those attending the April 19 meeting were supportive expanding ADUs citywide.

Public Hearing Testimony
On April 20, the Planning Commission held a public hearing. Six people testified and 17 written comments were received by the closing of the comment period on Monday, April 23. With

exception of two neutral letter from District 2 Community Council and District 9 Fort Road, all the oral and written testimony supported permitting ADUs within a larger area of the city or citywide. Six district councils (District Councils 5, 6, 10, 11, 13, and 14) not included in the City Council resolution asked to be included in the study.

Themes of the testimony included:

- Expand ADUs to additional districts or citywide to support increased housing choice, increased housing supply, aging in community, affordable housing, and neighborhood wealth building
- Decreasing minimum lot size requirements
- Consideration of amending the height requirements
- Question on certificate of occupancy
- Concern over variances being granted for who can live in an ADU
- A request to consider allowing movable, tiny homes

Analysis

Expanding ADUs to additional planning districts or citywide

The Comprehensive Plan supports studying the potential of implementing accessory dwelling units throughout the city. Land Use Policy 1.6 states: "Explore the potential for accessory units in Established Neighborhoods." Established neighborhoods is a future land use category of the plan, and it guides the areas of the city that are predominately residential. In addition, Housing Policy 2.17(b) states: "Explore via a zoning study, the potential for accessory units in existing neighborhoods" to support creativity in infill housing.

In meets with the district councils and in public testimony, there was strong support expanding the ADU study beyond the five areas identified in the February 7 City Council Resolution. Letters of support were received from District Councils 1, 5, 6, 7, 10, 11, 13, and 14. In addition, the Saint Paul Mayor's Advisory Committee on Aging as well as 10 residents or interested parties provide written or verbal testimony in support of ADUs.

Reasons identified for supporting expanding the area in which ADUs are allowed in Saint Paul included:

- increased housing choice for city residents and more flexible use of property;
- increased housing supply;
- possible additional source of affordable housing;
- ability to age in community;
- potential for additional intergenerational living opportunities; and
- local wealth building.

The following analyzes questions and concerns that were raised as part of Public Hearing testimony and/or heard while meeting with the district councils that relate to an expansion of where ADUs would be allowed.

Certificate of Occupancy (C of O)

District 2 raised concerns over potential lack of inspections for ADUs through the City's C of O program due to the owner-occupancy exemption of that program. Section 40.02 of the City's

legislative code states: “An owner-occupied single-family house, duplex, or condominium unit shall be exempted from the requirement to have and maintain a fire certificate of occupancy.” Thus, only properties with ADUs in an accessory structure would fall within this program and then only the unit in which the owner did not reside would be inspected. It has been the City’s policy to not require inspections of owner-occupied one- or two-family dwellings. Should the City amend its policy on C of Os to require owner-occupied duplexes receive a C of O, ADUs should also be included in those regulations.

Those permitted to live in an ADU

Due to limiting occupancy to the regulatory definition of a family, confusion as to who can live in an ADU persists. District 2 identified the need to potentially grant variances to allow people beyond direct family members as an issue with the ordinance as currently adopted. Section 65.913(e)1 states: “The total occupancy of the principal dwelling unit and accessory dwelling unit shall not exceed the definition of family in Section 60.207 allowed in a single housekeeping unit.” The Zoning Code definition of family is: “One (1) or two (2) persons or parents, with their direct lineal descendants and adopted or legally cared for children (and including the domestic employee thereof) together with not more than two (2) persons not so related, living together in the whole or part of a dwelling comprising a single housekeeping unit. Every additional group of four (4) or fewer persons living in such housekeeping unit shall be considered a separate family for purpose of this code.” This limits the number of non-lineal descendants living in a household, but provides some flexibility.

Parking

Districts 2 and 9 raised the issue of potential parking problems associated with ADUs. Under § 65.913(g), no additional parking is required with an ADU so long as the minimum parking requirement for the one-family dwelling is met. Because the occupancy of a one-family dwelling with an ADUs is limited to the Zoning Code definition of one family the need for parking would be equal to that of a one-family dwelling; therefore, the parking standard for a one-family dwelling is adequate for a one-family dwelling with an ADU.

Student Housing

When meeting with Districts 13 and 14, questions arose as to how ADUs would be regulated under the Student Housing overlay and if more student housing could become available in the neighborhood. While there is potential for students to live in accessory dwelling units, the Student Housing Neighborhood Overlay District as well as the ADU one-family and owner-occupancy requirements adequately address the issue.

The pink dots show the extent of the SH Student Housing Neighborhood Overlay District.

Section 67.700 SH Student Housing Neighborhood Overlay District puts forward restrictions on the number of one- and two-family dwellings that could be used to house undergraduate students in the area bound by Mississippi River Boulevard, Marshall Avenue, Cretin, Avenue, and Interstate 94, Snelling Avenue, Summit Avenue, Fairview Avenue, and St. Clair Avenue. Those dwellings

that require a Certificate of Occupancy (non-owner occupied one- and two-family dwellings) must register with the City if they are renting to three or four undergraduate students in one of the units. A unit must be 150 feet away from another registered unit.

As described above, ADUs within a principal structure and those within an accessory structure are regulated differently under the City's C of O program. As such, ADUs that are part of the principal structure would not be regulated under the Student Housing overlay district just as a one- or two-family dwelling where the homeowner lives on site and rents out rooms to undergraduates are not regulated as student housing. If the ADU is located in an accessory structure, either the detached ADU or principal structure is required to get a C of O depending on which was used as the rental unit. Should the homeowner choose to rent either the principal structure or the detached ADU to three undergraduate students (under the ADU code they would be unable to rent to four and still meet the definition of family), the Student Housing overlay requirements would apply to the rental unit.

Short Term Rentals and ADUs

On October 25, 2017, the City Council adopted a short-term rental ordinance that established short-term rental dwelling units as a use in the zoning code and made them a permitted or conditional use in zoning districts in which ADUs are permitted. Section 65.642 defines the use and sets forward four standards and conditions. Per § 65.642(a), owner-occupied duplexes are allowed to have two short-term rental dwelling units if the homeowner is on the premises during the stay. However, since ADUs are not duplexes only one short-term rental dwelling unit would be permissible on the site. Under both the ADU and the short-term rental requirements, the number of people residing on the premises is limited to the definition of family in § 60.207.

Reducing Minimum Lot Size Requirement

Section 65.913(b) sets 5,000 sq. ft. as the minimum zoning lot size for an ADU. [2] Both District Councils 11 and 13 requested that this standard be reduced to allow for additional opportunities for ADUs to be developed. Of particular concern was large homes on lots that are not 5,000 square feet, but would have sufficient space within the principal structure to accommodate an ADU.

In reviewing other local cities' ADU requirements, suburban communities often have large minimum lot area requirements, while Minneapolis and Richfield do not have a minimum lot area requirement. In Saint Paul, 5,000 sq. ft. was used as the requirement as it is the smallest lot size standard for new single-family lots. As shown below, approximately, 39,000 one-family lots meet this standard, 12,300 potentially meet the standard, and 5,630 do not meet this standard.

There are three categories identified on the map in Attachment 3:

- *Likely to meet 5,000 sq. ft. standard:* Lot size is greater than or equal to 5,000 sq. ft.
- *Potential to meets 5,000 sq. ft. standard:* Lot size is such that if adjoining an alley of at least 14 feet in width, it may have sufficient lot area.
- *Unlikely to meet 5,000 sq. ft. standard:* Lot is less than 5,000 sq. ft. in area and does not adjoin an alley.

[2] Under § 63.101, lots that adjoin a dedicated public alley can include the area one-half the width of the alley is considered part of the lot for lot area calculations.

District	Number of Zoning Lots that Meet the Lot Area Requirement		
	Likely	Potential	Unlikely
1	4,093	232	55
2	5,613	668	329
3	2,222	300	547
4	1,771	925	531
5	3,158	2,137	537
6	2,378	757	613
7	741	1,010	472
8	926	523	435
9	1,143	844	404
10	3,561	648	347
11	1,180	1,432	331
12	1,032	20	45
13	2,407	207	666
14	3,965	1,503	216
15	4,654	1,049	49
16	1,039	37	56
17	20	0	0
Total	39,903	12,292	5,633

District 13 has the highest incident of lots that do not meet this standard due to a large area of the district being developed without alleys.

There would be little impact to a property or surrounding neighbors by allowing an ADUs within the principal structure without a minimum lot size requirement. Currently most of these legally nonconforming lots contain a one-family dwelling. The total occupancy of both a one-family dwelling and a one-family dwelling with an ADU have the same limit under the definition of family. The primary difference between a one-family dwelling and a one-family dwelling with an ADU is separation of living space between the principal and accessory unit. As such, there are no impacts to the lot itself if principal structure has internal modifications to allow for space separation between units. Therefore, the recommendation is to allow ADUs to be permitted in principal structures with no minimum lot size requirement.

Amending Height Requirements

At the Planning Commission public hearing, the homeowner who built the City's only ADU under the existing ordinance testified that the City's height requirements for ADUs in accessory structures was a challenge to his project. Under § 63.501 the maximum height of accessory building that includes a dwelling unit can be the lesser of 25 feet or the height of the principal structure. While working within this height limitation may present challenges, no change to this standard is proposed at this time. This requirement is more flexible than Minneapolis', which limits height to the lesser of 20 feet or the height of the principal structure and does not allow the highest point of the accessory structure to exceed the highest point of the roof of the principal structure. The recommendation is to maintain this standard as is, but to work with DSI staff to monitor the issue as more ADUs are proposed and developed in Saint Paul.

Expanding definition of ADUs to include movable, tiny home units

Testimony was provided requesting that the definition of an ADU be expanded to included movable tiny houses as they provide a more affordable ownership housing option. Movable tiny houses are customized houses that are built on trailers and can be transported by personal vehicle. Moveable tiny homes were researched as part of a 2017 study that developed a model

ordinance for small home development, which was prepared by Larry Soderholm. In this report, it is noted that "with regard to zoning, tiny houses on wheels belong in mobile home parks, where they can plug into water, sewer, and electricity, or in public parks that have RV campsites." In that report, no further recommendations were made to permit them in the city.

City Sewer and Water Connections

Concern over the cost and practicality of requiring an independent sewer and water connections at the street for ADUs in accessory structures was brought forward during discussions with the community and at the Planning Commission. This issue is outside the purview of the Zoning Code, and is regulated under the State's Plumbing Code. Section 311.1 of the 2015 Minnesota Plumbing Code states: "…every building shall have its own independent water and sewer connection except that a group of buildings may be connected to one or more sewer manholes that are constructed to standards set by the Authority Having Jurisdiction." Stephen Ubl, the City's Building Official, confirmed the City's interpretation that an ADU in an accessory structure needs to have an independent sewer connection, but that in rare instances there may be exceptions granted if it is not possible to connect to City services available to the lot.

Requested Planning Commission Action

The Comprehensive and Neighborhood Planning Committee recommends approval and forwards these proposed amendments on to the Mayor and City Council.

1. Permit ADUs citywide by eliminating section § 65.913(a). As the scope of the amendments enlarged with requests from six additional areas district councils beyond the five identified in the City Council resolution and the recommend changed to permitting ADUs citywide, there is no need to describe specific areas of the city in which ADUs are permitted.
2. Amend § 65.913(b) to only pertain to ADUs located within an accessory structure.
3. Permit ADUs in the Amendment § 66.221 to permit ADUs in the RL One-Family Large Lot zoning district. RL is only applied in District 1, thus it was not included in the original ADU ordinance that was applied only to the University Avenue Area.

The proposed zoning text amendments follow. Existing language to be deleted is shown by ~~strikeout~~. New language to be added is shown by <u>underlining</u>.

Sec. 65.913. - Dwelling unit, accessory.

A secondary dwelling unit, subordinate to a principal one-family dwelling, within or attached to a one-family dwelling or in a detached accessory building on the same zoning lot.

Standards and conditions:

~~(a) *Lot location.* The lot shall be located within one-half (½) mile of University Avenue between Emerald Street and Lexington Parkway.~~

(~~b~~a) *Minimum lot size.* <u>For accessory dwelling units located in an accessory structure, t</u>he lot shall be at least five thousand (5,000) square feet in area.

(~~c~~b) *Number of accessory units.* There shall be no more than one (1) accessory dwelling unit on a zoning lot.

(~~d~~c) *Compliance with other city, local, regional, state and federal regulations.* Pursuant to section 60.109 of the Zoning Code, all accessory dwelling units must comply with city, local, regional, state and federal regulations.

(~~e~~d) *Unit occupancy.*

(1) The total occupancy of the principal dwelling unit and accessory dwelling unit shall not exceed the definition of family in Section 60.207 allowed in a single housekeeping unit.

(2) The property owner of record shall occupy either the principal dwelling unit or the accessory dwelling unit as their permanent and principal residence. Using the form provided by the city, the property owner shall execute a declaration of land use restrictive covenants and owner's warranties creating certain covenants running with the land for the purpose of enforcing the standards and conditions of this subsection and file the same with the county recorder. The property owner must deliver an executed original of the declaration, which shall display its date and document number of record, to the zoning administrator before any city building or zoning permits required for the accessory dwelling unit can be issued.

(3) The property owner shall file an annual affidavit with the zoning administrator verifying continued owner-occupancy of the property as their permanent and principal residence. A fee shall be collected in accordance with section 61.302.

(4) At the request of the property owner and upon inspection finding the accessory dwelling unit has been removed, the zoning administrator shall record a release of any previously recorded covenant for that accessory dwelling unit. Any and all filing costs shall be the responsibility of the property owner.

(~~f~~e) *Unit size.* The floor area of the accessory unit shall be a maximum of eight hundred (800) square feet. If the accessory unit is located interior to the principal structure, the principal structure shall have a minimum floor area of one thousand (1,000) square feet and the accessory unit shall not exceed one-third (⅓) of the total floor area of the structure. For multi-story principal structures built prior to the enactment of this section, the maximum floor area of an accessory dwelling unit may be equal to that of the first floor, but shall be less than or equal to fifty (50) percent of the floor area of the structure.

(~~g~~f) *Access and entrances.*

(1) A walkway shall be provided from an abutting public street to the primary entrance of the accessory dwelling unit.

(2) Upper floor units within the principal structure shall have interior stairway access to the primary entrance of the unit. Secondary stairways required for fire safety may be located on the exterior of the side or rear of the building, but shall not be allowed on the front of the building.

(3) Exterior stairways shall be built of durable materials that match the finish of the principal structure or accessory building to which they are attached. Raw or unfinished lumber shall not be permitted.

(~~h~~g) *Parking.* Provided that the minimum parking requirement for the principal one-family dwelling on the lot is met, no additional parking is required.

(~~i~~h) *Ownership.* The accessory dwelling unit shall not be sold separately from the principal dwelling unit, and may not be a separate tax parcel.

Sec. 66.221. – Principal uses.

Table 66.221, principal uses in residential districts, lists all permitted and conditional uses in the RL—RM3 residential districts, and notes applicable development standards and conditions.

Table 66.221. Principal Uses in Residential Districts

Use	RL	R1-R4	RT1	RT2	RM1	RM2	RM3	Definition ~~Development~~ (d) Standards (s)
Residential								
....								
Accessory Uses								
Accessory use	P	P	P	P	P	P	P	(d), (s)
Dwelling unit, accessory	P	P	P	P	P	P		(d), (s)
Accessory retail service and office						C	C	(s)
Support services in housing for the elderly						P	P	(d), (s)

Attachments:

1. City Council Resolution
2. Public Testimony (letters only, minutes not completed at drafting of report)
3. ADU Analysis Maps

City Hall and Court House
15 West Kellogg Boulevard
Phone: 651-266-8560

City of Saint Paul

Legislation Details (With Text)

File #:	RES 18-162	**Version:**	3	**Name:**	
Type:	Resolution			**Status:**	Passed
				In control:	City Council
				Final action:	2/7/2018

Title: Directing the Planning Commission to undertake a zoning study to determine whether accessory dwelling units should be permitted in the Mounds Park, and Planning District 1 (Eastview, Conway, Battle Creek and Highwood Hills), Planning District 3 (West Side), Planning District 7 (Thomas-Dale), and Planning District 9 (West Seventh) areas and regulated under § 65.913(a).

Sponsors: Jane L. Prince

Indexes:

Code sections:

Attachments:

Date	Ver.	Action By	Action	Result
2/14/2018	3	Mayor's Office	Signed	
2/7/2018	1	City Council		

Directing the Planning Commission to undertake a zoning study to determine whether accessory dwelling units should be permitted in the Mounds Park, ~~and~~ Planning District 1 (Eastview, Conway, Battle Creek and Highwood Hills), Planning District 3 (West Side), Planning District 7 (Thomas-Dale), and Planning District 9 (West Seventh) areas and regulated under § 65.913(a).

WHEREAS, on September 19, 2016, the City of Saint Paul approved adding dwelling units as an accessory use in the RL, R1-R4, RT1, RT2, RM1-RM3, and T1-T4 zoning districts; and

WHEREAS, under §65.913(a) accessory dwelling units are limited to one-half mile of University Avenue between Emerald Street and Lexington Parkway; and

WHEREAS, Land Use Policy 1.6 and Housing Policy 2.17(b) of the Comprehensive Plan support a zoning study to explore accessory units in Established Neighborhoods; and

WHEREAS, residents of the Mounds Park, ~~and~~ District 1, District 3, District 7, and District 9 areas have expressed interest in allowing ADUs in ~~that~~ those parts of the city; and

WHEREAS, future land use in the Mounds Park and District 1, District 3, District 7, and District 9 residential areas are guided Established Neighborhood in the Comprehensive Plan; and

WHEREAS, Policy H3.6 of the District 1 Community Council Community Plan states: “Explore the potential for accessory dwelling units in all single-family residential zoning districts, including what impacts this would have on both the zoning districts and the community;” and

WHEREAS, Mounds Park is generally described as the area bound by Interstate 94 to the north, Highway 61 to the east, and Mounds Boulevard to the south and west;~~,~~ ~~and~~ District 1 is generally described ~~by~~ as the area

bound by Minnehaha Avenue to the north and west, McKnight Road to the east, Red Rock Road to the south, the Mississippi River to the west to Warner Road to Highway 61 to Birmingham Street up to Minnehaha Avenue.; District 3 is generally described as the area bound by the Mississippi River to where Annapolis Street, if extended, meets the Mississippi River except for the area bound by Sidney Street to the north, Bidwell Street to the east, Annapolis Street to the South, and Charlton Street to the west; District 7 is generally described as the area bound by Burlington Northern Rail to the north, Interstate 35E to the east, University Avenue to the south and Lexington Parkway to the West; and District 9 is generally described as the area bound by Interstate 35E to the north, Kellogg Boulevard to Robert Street to the northeast, the Mississippi River to Interstate 35E to the northeast to the southwest, Interstate 35E to Shepard Road to Homer Street to West Seventh to Interstate 35E;

NOW, THEREFORE, BE IT RESOLVED, that the City Council requests that the Planning Commission complete a zoning study to consider permitting ADUs in Mounds Park, and Planning District 1, District 3, District 7, and District 9 areas.

District 1 Community Council

2105 ½ Old Hudson Road, Saint Paul, MN 55119
www.district1council.org district1council.blogspot.com

Community Council Office
(651) 578-7600 (phone)
(651) 578-7404 (fax)
district1council@gmail.com

Youth Programming
(651) 578-7400 (phone)
(651) 578-7404 (fax)
district1chia@gmail.com

April 20, 2018

Saint Paul Planning Commission
15 Kellogg Blvd W
Saint Paul, MN 55102

Dear Planning Commissioners:

The District 1 Community Council writes to express its support for the Accessory Dwelling Unit (ADU) study currently underway. Planning staff visited our Land Use Committee to explain the study in-depth and also provided information that was displayed at our Annual Meetings in March.

The Housing Chapter of the District 1 Community Plan includes language supporting this study:

"H3.6 Explore the potential for accessory dwelling units in all single-family residential zoning districts, including what impacts this would have on both the zoning districts and the community."

We understand that the scope of the current study is limited to the locational requirement of the ordinance, the expansion of which we support, however there were additional aspects that were discussed that we would like addressed in the future. The first is the requirement that occupants of the ADU must, when taken together with the occupants of the principal structure, comprise a family under the code. We would support removing that requirement entirely, especially when the principal structure is owner-occupied.

Additionally, we have broader concerns about the definition of family in the zoning code. Many of our residents are cost-burdened and can only afford housing when several unrelated adults share a housing unit. We are aware that there are housing units in our district that have more than four unrelated adults occupying them, and that does not significantly impact our neighborhoods negatively. The reality of multi-generational families also can run afoul of this requirement which disproportionally harms immigrant families in our district.

Finally, the requirement of the state building code to separately connect an ADU directly to the sanitary sewer unreasonably increases the cost of ADU construction, and thus reduces the feasibility of ADUs in our district.

Thank you for the opportunity to consider an expansion of ADUs. We look forward to continuing to work with planning staff to address additional issues regarding ADUs and other provisions of the zoning code.

Sincerely,

Paul Sawyer
President and Interim Land Use Chair

DISTRICT 2 COMMUNITY COUNCIL

1365 Prosperity Ave
Saint Paul, MN 55106-2108
Phone: (651) 774-2220
Fax: (651) 774-2135

April 19, 2018

To: Jamie Radel, Dept of PED

From: Lisa Theis, Program Director

RE: Comments on Accessory Dwelling Units (ADUs)

Thank you for allowing all District Councils/Neighborhoods to weigh in on the issue. On April 11, 2018 the District 2 Community Council land use committee met to discuss the proposed zoning changes for ADUs the committee had several concerns.

Our land use committee expressed concerns about the amount of time that has been spent and is continued being spent on the "phasing in" of Accessory Dwelling Units. It was felt that the zoning code should be consistent throughout the City of Saint Paul and to have a particular type of housing stock allowed in one area and not others was questionable and not the best policy. Even our discussion and concerns were tempered because the units proposed would not be allowed in District 2. The Committee felt that it was difficult to be invested in the discussion that isn't going to impact our neighborhood today, but may in a year or five years but also may never impact our neighborhood.

On the propose legislation itself, the committee's primary concern was the issue of variances. Although the proposed lot sizes and principle structure requirements were reasonable, the concern is that with the use of the property frequently being actual mother-in-laws and grandmothers will make it far too easy to grant variances based on personal family needs and hardships that have lasting impact on the property long after that particular family has moved on. The committee would strongly urge language in the ordinance that would make variances more difficult.

Another concern brought up by the committee was there was no inclusion of information on certificates of occupancies or the inspection of these proposed properties. The committee made the assumption that the units would be exempt since the City doesn't inspect duplexes that are owner occupied in one of the units which could lead to health and safety issues. With these units being as small as they are and with the building owner not being experienced in rental property, the lack of oversight by the City for inspections of safety and health of individuals living in the dwelling unit would be quite concerning to our committee.

Finally, the last concern was about parking and the committee was unsure that one off street parking spot for the two units would be enough. This, they believed must also be addressed in the final ordinance.

Thank you again for allowing all District Councils to weigh in on the proposed ordinance. Although the committee see many positive opportunities for affordable housing within the proposal, there are many concerns over phasing in the ordinance citywide, clarification on inspections and variances and potential parking issues that must be addressed.

Payne-Phalen
COMMUNITY COUNCIL

567 Payne Avenue, St. Paul MN 55130 www.paynephalen.org 651-774-5234 district5@paynephalen.org

April 6, 2018

Saint Paul Planning Commission
25 West 4th Street, Suite 1400
Saint Paul, MN 55102

RE: Accessory Dwelling Units

Dear Commissioners:

The Payne-Phalen Community Council was fortunate to have Ms. Jamie Radel at our recent board meeting to present the City of Saint Paul's zoning study for accessory dwelling units in five new neighborhood areas. Our Board of Directors supports the study of ADU's city wide, including our neighborhood.

We see ADUs as one potential solution to several problems that we face as a neighborhood. In Payne-Phalen we have multiple commercial corridors, but each one has several building vacancies. In our draft neighborhood plan we outline a goal to increase density in order to support new and existing businesses along our commercial corridors. Allowing ADUs would potentially increase our population density without necessarily adding large apartment buildings.

Across the cities of Saint Paul and Minneapolis vacancy levels are very low. This increases competition for homes for sale and rent, which drives prices up. Allowing ADUs would potentially provide an increase in housing supply, again without dramatically changing the land use and character of our existing neighborhoods.

Finally, many people see ADUs as a convenient solution for our aging population. ADUs provide an opportunity for multi-generational living on the same property but in separate living spaces. Additionally, as residents age they often want to downsize, and ADUs could allow them to continue living on their own property but in a smaller home.

On behalf of the Board of Directors,

Lissa Jones-Lofgren, Interim Executive Director

North End Neighborhood Organization (District 6)
171 Front Avenue
Saint Paul, MN 55117
651-488-4485 ed@nenostpaul.org

April 17, 2018

Jamie Radel, Senior Planner
Department of Planning & Economic Development
25 West 4th Street
Saint Paul, MN 55102

RE: Accessory Dwelling Units

The North End Neighborhood Organization is requesting to be included in neighborhoods that will have the option of allowing Accessory Dwelling Units. With the growing population in St Paul, finding responsible ways to accommodate the need for housing falls into many categories. Higher density units i.e. apartments, condos and townhomes provide one set of housing choices as well as Accessory Dwelling Units for single family home owners. The zoning code should be consistent throughout the city of Saint Paul and to have a particular type of housing stock allowed in one area and not others is questionable and not the best policy.

Across the metro ADU's are growing in popularity because of the economic, aging in place, and family solutions they provide when multiple generations reside together. Allowing ADUs in neighborhoods is vital to the growth and stability of our neighborhoods.

The North End has numerous parcels that would fall within the lot size required for an ADU. If a homeowner in the North End wishes to construct an ADU they should have that choice available if all defined standards and conditions are met.

Thank-you for the opportunity and if you have questions, please feel free to contact us at the numbers above.

Best:

Rich Holst

Rich Holst
Chair

cc: Ward 1
Ward 5

District 10 Como Community Council
1224 Lexington Parkway North
Saint Paul, MN 55103
651.644.3889
district10@district10comopark.org
www.district10comopark.org

April 19, 2018

Saint Paul Planning Commission
City Hall
15 Kellogg Blvd. W
Saint Paul, MN 55102

Commissioners:

The Como Community Council board voted on April 17 to urge you to make more areas of the city eligible for accessory dwelling units, and to include District 10 among eligible areas.

Accessory dwelling units provide options for local residents to age in place and allow for creative housing solutions for inter-generational living in the city. ADUs have the potential to help address a lack of affordable housing in the city and allow for increased density without disturbing the residential feel of a neighborhood. ADUs support these and other goals in our neighborhood plan, and we look forward to having them available as option for future development.

Sincerely,

Michael Kuchta
Executive Director

Cc: Council Member Dai Thao, Council Member Samantha Henningson, Council Member Amy Brendmoen

UNION PARK DISTRICT COUNCIL
1602 Selby Avenue, Suite 10, Saint Paul, MN 55104
651.645.6887 | info@unionparkdc.org | www.unionparkdc.org
An Affirmative Action, Equal Opportunity Employer

April 18, 2018

Jamie Radel, Senior Planner
City of Saint Paul
25 West 4th Street
St. Paul, MN 55102

Dear Jamie:

Thank you so much for presenting at the April 16 meeting of the Union Park District Council Committee on Land Use and Economic Development.

At the meeting, the Committee unanimously supported the following recommendations related to Accessory Dwelling Unit (ADU) ordinance changes:

- The Committee supports the expansion of the area in which ADUs are allowed to include all of the Union Park District Council area, and all of the City of Saint Paul.

- The Committee supports allowing ADUs on parcels smaller than 5000 square feet, as long as the ADU is within the existing structure.

Please let me know if you have any questions.

Sincerely,

Julie Reiter

Julie Reiter, Executive Director
Union Park District Council

Macalester Groveland
COMMUNITY COUNCIL

320 South Griggs Street
St. Paul, MN 55105
www.macgrove.org

651-695-4000
mgcc@macgrove.org

April 19, 2018

Ms. Jamie Radel
Department of Planning and Economic Development
City of Saint Paul
25 W. Fourth Street
Saint Paul, MN 55102

Ms. Radel:

On April 5th, 2018, the Housing and Land Use Committee ("HLU") of the Macalester Groveland Community Council ("MGCC") held a public meeting, at which it heard a City presentation regarding the potential expansion of Accessory Dwelling Units ("ADUs") into the D14 (MGCC) area. Prior to the meeting, two comments were received in favor of the expansion. At the meeting, attendees spoke in favor of and in opposition to the expansion.

After consulting the Macalester-Groveland Long Range plan, considering neighborhood feedback and assessing the merits of the proposal, the HLU passed the following resolution on an 11 – 6 vote:

*****The Macalester-Groveland Community Council supports the expansion of Accessory Dwelling Units into the Macalester-Groveland neighborhood*****

If you have questions or concerns, please do not hesitate to contact me.

Liz Boyer
Executive Director
Macalester-Groveland Community Council

cc (via email): Ward 3, City of Saint Paul

Radel, Jamie (CI-StPaul)

From: VICTORIA ERHART <verhart@comcast.net>
Sent: Tuesday, April 17, 2018 1:34 PM
To: Radel, Jamie (CI-StPaul); Rue, Karen
Subject: Expansion of ADU's

Jamie: This email is to let you know about my strong support for city-wide ADU's. I live in North Saint Anthony Park, was involved with a trial project developing theoretical ADU's, with architects giving time pro bono, and I have been dismayed at the reluctance of the city to move forward on these. I had planned to develop one for my mother, found out that I could not (although I live across the street from houses where ADU's are legal), and she ended up in an assisted living unit. Is this reasonable?

As we look to decrease sprawl by increasing urban density, these units make absolute sense. And, having visited many cities on the West Coast, I know that they can be beautiful. Count me among the many people I know who support the expansion of the legality of these completely sensible units.

Thanks for your time,

Victoria Erhart

1301 Chelmsford St

Saint Paul, MN 55108

Radel, Jamie (CI-StPaul)

From: Hietala, Dori <Dori.Hietala@AndersenCorp.com>
Sent: Friday, April 06, 2018 2:50 PM
To: Radel, Jamie (CI-StPaul)
Subject: RE: ADU's in MacGroveland

Dear Jamie,

I am writing this e-mail in support of allowing Accessory Dwelling Units (ACU) in the MacGroveland neighborhood of St. Paul.

I believe this change will provide options for community members to offer physical and financial assistance to aging and young families struggling with health, mobility and/or financial issues while continuing to build a financially stable economy in St. Paul. My personal desire is to provide a living space for my 82 year old father that will offer him independence and allow me to monitor and assist him as he ages. It would also allow an opportunity for parents to provide support to young families while maintaining each clans personal space.

Thank you for your consideration.

Sincerely,

Dori Hietala
1324 Sargent Ave
St. Paul, MN. 55105
dorihietala@gmail.com
763.227.7645

From: Radel, Jamie (CI-StPaul) [mailto:jamie.radel@ci.stpaul.mn.us]
Sent: Friday, April 06, 2018 2:12 PM
To: Hietala, Dori <Dori.Hietala@AndersenCorp.com>; Liz Boyer <liz@macgrove.org>
Subject: RE: ADU's in MacGroveland

If you send me an email that states your position, I can include that as testimony; it will be provided to the planning commissioners.

Regards,
Jamie

April 18, 2018

I am writing to urge the City of Saint Paul to allow, encourage, and truly embrace the development of Accessory Dwelling Units. We need them.

Here's why.

Cost/Effectiveness: Building an ADU is hands down the most cost-effective way for homeowners to increase their property values, and gives them the potential to recoup their investment BEFORE they sell. ADUs add finished square feet of living space to a homeowner's property. This is much more valuable than, say, a kitchen remodel, and can pay for itself through owner-occupied and owner-supervised rentals.

Affordability: At the same time, a property that contains an ADU is intrinsically MORE affordable than a property without one, since there is the potential for rental income to offset the mortgage cost. This is important, especially in Saint Paul, because we have a housing equity issue.

Housing Equity: Saint Paul has 44.8% nonwhite residents (compared to 21.6% in Minneapolis and 22.5% overall in the Midwest.)[1] However, our non-white populations appear to be clumped together rather than dispersed more equitably. The Thomas/Dale area has 81.6% non-white residents. Payne/Phalen, Dayton's Bluff, and the North End are all sitting at about 61% non-white, and Battle Creek, West Side, and Summit-University are in the mid-50% range. Compare this to Como, Mac/Groveland, and Summit Hill – all below 15% non-white residents.

This is interesting to me. I grew up in Mac/Groveland, and to be honest, I didn't see many people of color until I moved away to college. I didn't move back to Saint Paul until I was in my early 50s, after having lived and traveled across the country and around the world, and then deliberately chose to live in the Mounds Park area of Dayton's Bluff on Saint Paul's East Side. It's real here. My neighbors come from a wide range of income and education levels, races and ethnicities. We watch out for each other. We have a 30-year tradition of neighborhood progressive dinners. I get to live in a 1910 Victorian fairytale home that I have poured thousands of dollars into – income that I generated from welcoming guests from around the world through Airbnb. My house is on the Twin Cities home tour this year – number 49. You should come see it.

So what does this have to do with equity? Well – I still visit Mac/Groveland occasionally and still don't see much affordable housing there. It's not that we really have a shortage of affordable housing in Saint Paul – affordable homes are out there. They're just not… dispersed. Increasing access to ADUs, allowing people to increase the value of their homes while at the same time making homes more affordable for buyers and increasing the availability of affordable rental housing, will mainstream diversity in Saint Paul and bring us closer to housing equity.

And that would be a good thing. There is absolutely no substitute for the actual connection that comes from living side by side when trying to bridge gaps. Trust happens through small kindnesses, like when you shovel your neighbor's walkway and another neighbor plows out your driveway (this happened to me this past winter). People stop being stereotypes when you get to know their names, and say hi to their kids. We have such need for connection across our ethnic and racial divisions.

---

[1] https://statisticalatlas.com/place/Minnesota/St-Paul/Race-and-Ethnicity Chart #25.

Living in community with one another is one way to decrease our fear of the unknown. The Other. Saint Paul is uniquely diverse in the Midwest, but has not embraced this.

Yet.

ADUs can help with this.

Small is big. And getting bigger. A few years ago, when my 80-something dad was beginning to realize that his two-bedroom apartment was too big for him, he wanted to downsize. He was looking for a small home that wouldn't need much maintenance. My siblings and I desperately wanted him to retain his privacy and dignity as he aged, but also worried that he would not be safe living on his own much longer. Assisted living in a senior center was not remotely appealing to this proud gentleman who had served in Allied Intelligence during WWII. Eventually, I did major remodeling on my home in Wisconsin to accommodate his physical needs, and invited him to live with me. Dad stayed in my home with me for a year, dying peacefully in his sleep surrounded by family as he wished.

Not everyone or every family can deal with bringing a relative into their home when there is a need. (Truth be told, it was quite challenging at times having dad live WITH me.) However, with ADUs, families can accommodate housing needs of loved ones without sacrificing privacy. This is a gift across generations. In another example, friends who had built an apartment over their garage in Hudson, WI, had planned to use it as an office and had done the remodel as an investment. When their niece and her infant daughter needed emergency housing because of a family crisis, however, they were able to offer her a welcoming and private space free of charge.

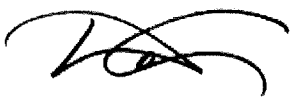
Because they lived in Hudson. They could also have had this option in Minneapolis. But not in Saint Paul.

Really?

It's time to *Accessorize* Saint Paul housing. We have many wonderful homes here, filled with character and charm. I, personally, would never dream of living in Woodbury. However, we need more flexibility in our housing options. Not everyone needs or wants 2,000 sf. Tiny houses are gaining in popularity, but there is also the option of not-so-big rather than tiny. Beautiful and graceful homes that are in the 600 – 900 sf range can be incredibly attractive and unique additions to their neighborhoods. Small does not mean poor quality. Small allows for good materials and thoughtful designs. Design can and should be regulated. ADUs can be extraordinary additions to their neighborhoods, adding a unique charm *because of*, not despite, their small size.

And when we invite these little ADU gems to populate our fair city, we will also be inviting cultural and ethnic diversity, transforming the very fabric of our neighborhoods.

Thank you.



Trudy Ohnsorg
1125 Burns Avenue, Saint Paul
TrudyOhnsorg@gmail.com
651-399-4887

Radel, Jamie (CI-StPaul)

From: Mark Thieroff <markthieroff@icloud.com>
Sent: Wednesday, April 18, 2018 10:47 PM
To: Radel, Jamie (CI-StPaul)
Subject: Comment on ADU proposal

Hi Jamie,

Below is my comment on ADUs for the Planning Commission.

Thank you.

Mark Thieroff

———————————————

Dear members of the Planning Commission,

I am writing to express my strong support for allowing all three types of ADUs, citywide. I support allowing ADUs for many of the typical reasons, which you will have heard from many others. I will therefore use my comment to explain why you should not be swayed by the reasons cited in opposition to ADUs.

I was on the St. Anthony Park ADU task force a couple of years back, and as part of that year long process I participated in 10 work sessions of the task force and two public meetings that we held. The meetings were well attended, by people on all sides of the issue. After all of those meetings I was forced to conclude that much of the opposition is based on opposition to change in general and opposition to rental housing in particular. Opponents would talk about the impact on the character of the neighborhood, yet our neighborhood has an increasing number of massive garages that are completely out of character, yet uncontroversial. Opponents would talk about the loss in greenery that might be caused by ADUs, yet property owners can and do already remove trees for additions, accessory structures and, yes, those massive garages. (And we are talking about private property after all.) Opponents would raise fears of a parking shortage, until data from the City demonstrated there is a volume of available on-street parking in our neighborhood that could never be consumed by ADU dwellers. There were also concerns about party houses and other nuisance issues, but this is adequately addressed by the owner occupancy requirement. On and on it went.

We have a housing shortage. ADUs will not alone solve that problem, or even make a large dent in the problem. But they can be part of the solution, while also providing a new option for those looking to age in place or live with extended family. Adding modest amounts of additional density can also provide a small boost to transit ridership and neighborhood businesses.

The last point I want to make is that this is a citywide issue and should not be decided on a neighborhood by neighborhood basis.

Thank you for considering my views.

Mark Thieroff
1438 Chelmsford St.

Radel, Jamie (CI-StPaul)

From: Rhona Wilson <rhonawilson@icloud.com>
Sent: Thursday, April 19, 2018 10:57 AM
To: Radel, Jamie (CI-StPaul)
Subject: Re: ADUs

No concerns at all. I'm at 1438 Chelmsford St, 55108.

Thank you!

Sent from my iPhone

> On Apr 19, 2018, at 10:46 AM, Radel, Jamie (CI-StPaul) <jamie.radel@ci.stpaul.mn.us> wrote:
>
> Hi Rhona-
>
> If you want this to be included in the official record, I need your address to be included. If you have concerns about that, I will redact it before it is distributed.
>
> Jamie
>
> -----Original Message-----
> From: Rhona Wilson [mailto:rhonawilson@icloud.com]
> Sent: Thursday, April 19, 2018 9:05 AM
> To: Radel, Jamie (CI-StPaul) <jamie.radel@ci.stpaul.mn.us>
> Subject: ADUs
>
> Hello Jamie,
>
> Ahead of tomorrow's meeting on ADUs with the Planning Commission, I wanted to voice my support for ADUs being permitted throughout the city of St. Paul. I'm not sure why only 5 areas of the city are being considered for this, and think this should be under consideration for all areas of St. Paul. I especially like the options that ADUs open up to families that wish to accommodate relatives at different stages of life, such as boomerang children, grandparents, family members with disabilities, in a tight and expensive housing market.
>
> Thank you for considering my point of view.
>
> Rhona Wilson (St Paul resident in 55108)
>

April 19, 2018

To the Saint Paul Planning Commission
RE: Accessory Dwelling Unit Study

As a new resident in Ward 2, I'd like to share some thoughts about accessory dwelling units (ADUs) for your consideration. I am in support of ADUs in all of Saint Paul.

We recently bought a home on the East Side. Prior to purchasing our home, we were looking only in Minneapolis and the area around University Avenue because of the ability to build ADUs. We have aging parents and want to plan for a future that includes them, and accessory dwellings would be a welcome possibility. Also, we wanted more potential flexibility to have additional income if we were in need.

One of the reasons we were comfortable making the decision to buy a house on the East Side was that we found one on a double lot, which we could split if needed, and essentially have an ADU-type arrangement. I recognize that standard lots are by far the most common in the neighborhood, and feel that everybody should have the opportunity to take advantage of the benefits of ADUs.

I believe that with reasonable considerations in the ordinance language, the fears that many people have, such as low-quality buildings and absentee landlords, can be minimized.

Thank you for reading this and please support ADUs not just in the Planning Districts being discussed, but throughout the City.

Sincerely,

Haley Richardson
2250 Maryland Ave E
Saint Paul, MN 55119

Frogtown Neighborhood Association (District 7)

501 North Dale Street, Saint Paul, MN ⓟ 55103
651-236-8699 www.frogtown.org

April 23, 2018

Saint Paul Planning Commission
City Hall
15 Kellogg Blvd. W
Saint Paul, MN 55102

Dear Planning Commission Members,

Frogtown Neighborhood Association strongly supports the expansion of the ADU area throughout the City. The Community and the organization are deeply concerned about our ADU's and need the kind of support this policy contemplates giving to our alley houses. They are culturally significant and will serve the same folks they were built to serve; Frogtowners!

The alley houses remain an important and underutilized source of naturally occurring affordable housing and so one more tool we can use in our struggle against the market forces of gentrification.

They are also again structures that can be used for our elders who are in serious need of affordable housing.

Thank you for working on this important policy and for ensuring the expansion reaches the communities that need it the most.

Very Sincerely,

Caty Royce
Co-Director FNA

Tia Williams
Co-Director FNA

West 7th/Fort Road Federation
974 West 7th Street
Saint Paul, Minnesota 55102

651-298-5599
FortRoadFederation.org

April 23, 2018

TO: Jamie Radel, Senior Planner
Department of Planning & Economic Development

CC: Councilmember Rebecca Noecker
310 City Hall

FROM: Becky Yust, President
Fort Road Federation

Becky L. Yust

[via email]

RE: Accessory Dwelling Units expansion

Thank you for presenting information about the expansion of Accessory Dwelling Units (ADUs) at the March meeting of the Fort Road Federation Board of Directors. We also had information available at our April annual meeting.

The Board nor the community took an official position on the expansion. Generally, we see the zoning as an opportunity for some households to provide an additional living unit, however, issues of parking could be a concern.

HAMLINE MIDWAY COALITION
DISTRICT COUNCIL 11
1558 W MINNEHAHA AVENUE,
ST. PAUL MN 55104
651.494.7682 | www.hamlinemidway.org

April 17, 2018

Jamie Radel, Senior Planner
Department of Planning & Economic Development
City of Saint Paul

To Whom It May Concern:

Hamline Midway Coalition supports changes to Saint Paul's Accessory Dwelling Unit ordinance to allow for the construction of ADU's in suitable areas throughout the entire city.

HMC also recommends the elimination of the minimum lot size requirement for attached ADU's.

If you have any questions, please contact me at 651-494-7682 or michaeljon@hamlinemidway.org.

Sincerely,

Michael Jon Olson

Michael Jon Olson, Executive Director

April 20, 2018

To: Jamie Radel, Planning and Economic Development, City of Saint Paul
Fr: Kathleen Kelso, Saint Paul Advisory Committee on Aging
Re: Zoning Changes to Allow City-Wide Accessory Dwelling Units

The Saint Paul Advisory Committee on Aging (ACOA) supports the proposed amendments to the zoning code that would permit accessory dwelling units in the R1 – RM2 and T1 – T3 zoning districts. We support regulations that establish standards and conditions, including conditions related to lot location, minimum lot size, number of accessory units, unit occupancy, unit characteristics, access and entrances, parking, and ownership.

The Saint Paul Advisory Committee on Aging seeks opportunities for community-wide discussions about the future of affordable and life-cycle housing in the metropolitan region. We look forward to thoughtful and intentional strategies to advance the stated policy priority of the Metro Council in Thrive 2040: ***Create housing options that give people in all life stages and of all economic means viable choices for safe, stable and affordable homes.***

We are all aging. Affordable and life-cycle housing as it relates to aging is not just about "boomers" but whole neighborhoods. As we age, the demographic shift will drive housing demand. Housing that is built or modified for aging households sends a message to people of all ages: Saint Paul supports neighbors as we age in our communities.

We consider this public discussion on ADUs and proposed amendments to the zoning code as the beginning of a city wide public discussion about "aging in community" and what that means – socially, culturally and economically.

The accelerating teardown phenomenon affecting the two metro central cities clearly reflects the increasing premium on living in urban locations where a wide range of amenities are available to people of all ages. Both Minneapolis and St. Paul are essentially "built out," thus ADUs offer a definite option for increasing housing stock.

ADUs provide a number of benefits for residents of both the primary and accessory units:

- Accessory units intended as rental housing are a source of additional income for primary unit owners, and would provide one or more additional sets of security "eyes" on a primary unit and adjacent properties. This would serve as a means to assist an older adult(s) to reside in his/her home safely.

- ADUs could house paid caregivers providing support for/assistance to residents in the primary unit who have various health/mobility limitations.

- ACOA strongly supports intergenerational living as a way to encourage and sustain aging in one's own community. There has been clear, definite growth in family "intergenerational" living in the U.S. in the past decade, and ADUs would readily

promote those opportunities. These arrangements may involve rental payments, but may more commonly involve housing at no or little charge for family members.

- Owners of a primary unit might choose to continue living there while family members (or others) move into the accessory unit. Or younger family members could move into the primary unit when the property owners relocate to the accessory unit. This option can be particularly important when the primary unit has accessibility problems for the owners, and the accessory unit can incorporate universal design features.

- Increasingly, groups of older adults, couples and/or singles, are discussing and seeking to contract for purchase, to modify or to design and build a custom home in residential areas. With an ADU, if the primary unit doesn't have adequate layout and/or accessibility for all involved, one or more in the group could live in the primary unit and the others in the accessory unit. This arrangement could facilitate care and support if/as health/medical conditions of certain members in a group change over time. These arrangements may involve various members renting from owners of the primary unit or living rent-free, or perhaps all parties have an ownership share.

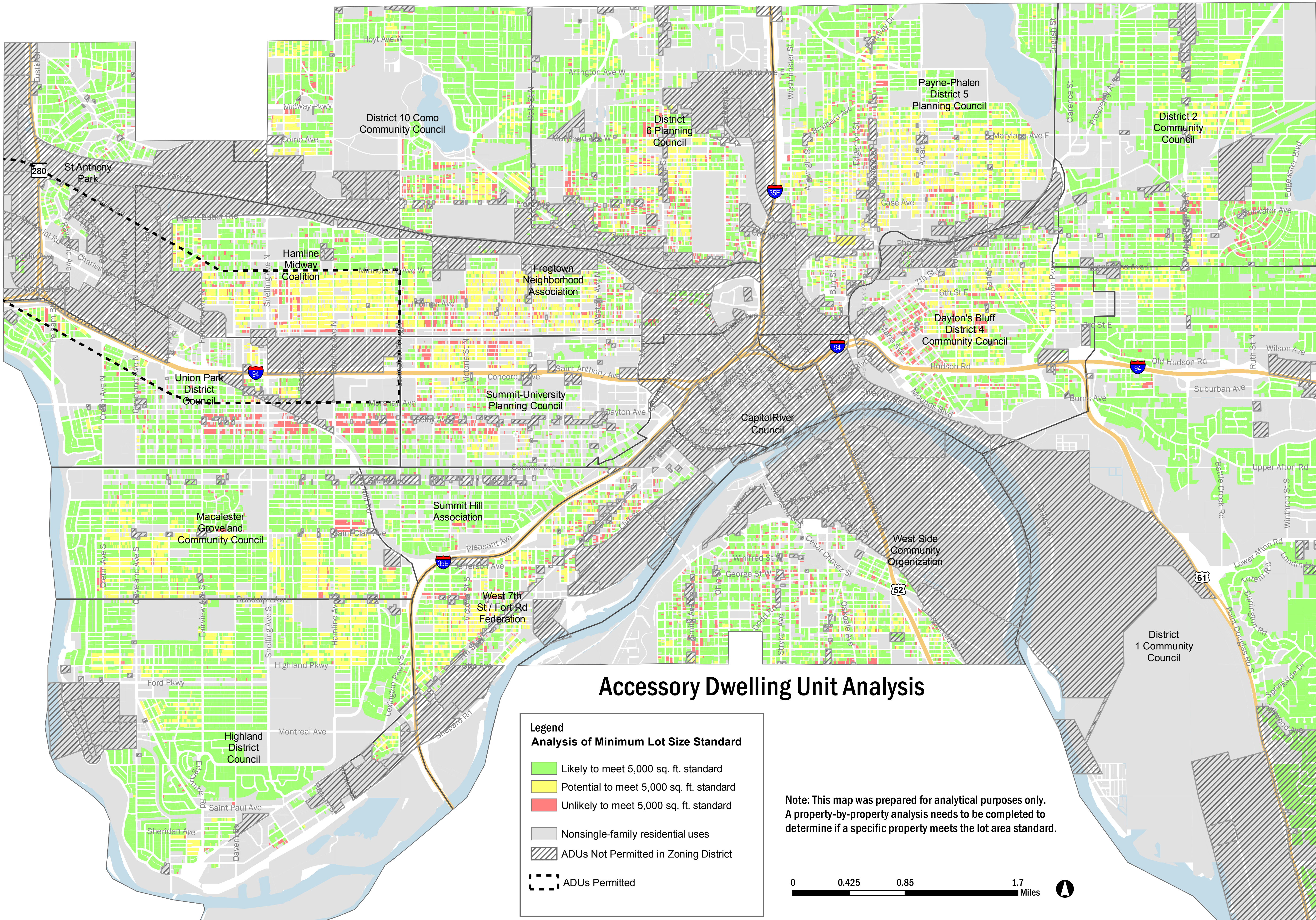
The ACOA encourages public conversations and public policy debates such as this one to acknowledge that people of all ages are at all times aging and that life-needs are constantly changing. We hope that neighbors will recognize the value of older adults in their neighborhoods by enabling all neighbors to live there and age in their community as long as it is possible.

The ACOA uses the term *aging in community* intentionally and often to reframe our way of thinking about aging. We encourage public discussion that shifts the focus from the dwelling place toward *relationships* that create the *social and community support* necessary for people of all ages to thrive in their communities.

The *Aging in Community* concept "…encourages a proactive strategy to create supportive neighborhoods and networks. Thus, the well-being and quality of life for elders at home becomes a measure of the success of the community "(Thomas, 2014). *Aging in Community* is the viable alternative to institutionalization; it is a way of life that at its heart recognizes that aging is the reality for all of us, and that whether it's the youngest among us, Millennials or Boomers, everyone is acknowledged and treated as a valuable resource in their community.

With the right set of policies for housing, including enforceable regulations for ADUs, older adults aging **in** community would be allowed to remain as integral members of that community.

Accessory Dwelling Unit Analysis



Note: This map was prepared for analytical purposes only. A property-by-property analysis needs to be completed to determine if a specific property meets the lot area standard.