

ADU Comment Emails

The following are suggested reasons why one would oppose the proposed ADU legislation:

1. Summit Hill has two of the most densely parked areas in the city. Specifically, the whole East Grand area from Milton to Dale has the largest parking shortfall by a magnitude of 3 over the second most densely parked area in the city (shortfall of about 1,500 parking spots). And, the area at Grand and Lexington has the fifth most densely parked area (shortfall of about 250 parking spots).
 - a. What this means is that all along Grand Avenue, and the surrounding streets, we have:
 - i. more congestion from cars circling to find parking spots;
 - ii. more cars coming and going through our neighborhoods, including, for example, on Avon and Victoria; and
 - iii. more pedestrian traffic and more pedestrian safety issues because of the increase in the number of people and the number of cars.
 - b. This is relevant to the ADU proposal for the following reasons
 - i. Summit Hill is unique in the city with a parking shortfall that far surpassing any other area.
 - ii. The byproducts of this shortfall (public safety concerns, congestion, traffic flow – all noted above) have resulted in density of use. ADUs, by their very nature, also create density of use and therefore more parking shortfall and the byproducts thereof. When the density is as great as it is in relation to city code, there should not be more density proposed.
2. The housing values in Summit Hill, and the assessed values for tax purposes, have been going down over the last several years.
 - a. This is relevant to the ADU proposal for the following reasons.
 - i. Proponents of ADUs, articulate the following benefits of ADUs –
 - 1) creates more density,
 - 2) allows relatives of residents to stay in proximity to a family (for example a separate residence for an older parent), and
 - 3) allows parties to generate income by renting the ADU to unrelated third parties.
 - ii. There is a compact between neighbors in a neighborhood as reflected in the City Code. The compact is that we are all going to act consistent with the City Code unless there is a variance approved by the City, after input from the neighbors. As a result of this compact, people invest in their homes and neighborhoods with the expectation that there will not be a change in City Code that could materially affect their housing value and their enjoyment of their neighborhood. A new ADU structure and the increased use of the neighborhood is at best a neutral to the property value and

enjoyment of a neighbor and most likely a negative. We should be thinking, from a City Code perspective, not only of the benefit to the ADU proponent, but also the affect on those around the ADU proponent. The possible negative effect should be dealt with through a variance request for an ADU and not a Code amendment. A code amendment is a material alteration of the compact noted above.

3. Historical Integrity

- a. The Summit Hill neighborhood has had a majority of single family homes for over 100 years. People moved into this neighborhood for that reason. People who live their seek the proximity to the urban lifestyle and the privacy and peacefulness that comes with single family homes.
- b. A city staff member actually stated at a public hearing that the homes in our neighborhood are “underutilized” because they are larger homes that are not filled to capacity. What she sees as “underutilization” is what we, the taxpayers, see as “intended use.” These are choices we make to live in these homes and to use as we are currently using. And, we pay the disproportionately high taxes compared to the adjacent cities, for this use.
- c. Many generations have lived in the Summit Hill neighborhood and the integrity of these homes has been brought back to life over the last 30 years. We need to protect these homes, the existing use and the existing value.
 - i. Plenty of intensification of use has been occurring in our neighborhood – side lots are being separated and built upon, and many multifamily units are being built on Grand Avenue. The Rule of 5 is forever allowing more intensification of use in the commercial area along Grand Ave. And, as noted above, our shortfalls in parking (density) far surpasses anywhere in the City.
 - ii. ADUs are not needed to promote intensification or density.

4. Suggested alternatives

- a. Require the approval of 75% of the neighbors for approval of ADU. In this way, those who could be negatively affected by the ADU will have the right to decide whether the ADU is acceptable to them. This type of approval is done for many other purposes under the City Code (although not the zoning code).
- b. Eliminate the Rule of 5 on Grand Avenue so that there is not further intensification from that source.

Brian Wenger
818 Goodrich

Some reflections on the “Accessory dwelling Units” discussion that took place on 19 July, 2018 during the meeting of the SHA District 16 Planning Council

Whenever the city develops and presents a proposal to citizens, it is essential that that proposal have at least three aligned elements – principles, policy, and purposes.

Participants at the July 19 meeting were adrift in aimless talk about unrelated or minor issues such as private revenue streams, parking, and the size of ADU's, because the larger context was not attended to. The purpose for the project, and alternative policies were not clear; yet, representative governance demands explicit and truthful rationales, based on the best data and logic available. This attention to purpose was nowhere clear at the meeting, and therefore, we were left with the question: what are the reasons driving the proposal? There were at least four dilemmas that came out of this context, all needing attention.

- 1) The lack of clarity between **diversity and unity** was stunning. The assumption that "one size fits all" is almost always incorrect. Within a democratic context, there is need for a balance between unity and diversity. This is common knowledge, and the truism that should be understood is - *to treat all neighborhoods the same is to deny their diversity*. Highland Park is not Summit Hill, and should not be. They are both attractive, but for different reasons. When thinking of St. Paul, some are drawn to the historic nature of Summit Ave., others to Lowertown, some to Frogtown. This diversity is a positive thing, and while ADUs might make sense in one area of the city, they may be inconsistent with the identity of other areas. The unity of St. Paul is made possible by its diversity...*E Pluribus Unum*. So, how does the concept of ADUs enhance the identity of St. Paul? How do they help balance diversity with unity? There is no way to answer these questions because the city's presentation did **not** articulate an identity of city or neighborhoods, and there was no clear policy reference.
- 2) A second problem was the connection between the well-established need for affordable housing and the role of ADU's. The tacit assumption was that Summit Hill could help address the problem of affordable housing through ADU's. This assumption was presented in a vacuum of economic understanding. There is no way that the market can address this issue. Free markets are driven by demand. This means that a commodity is viable in the marketplace if, and only if, it has two attributes – a desire for the commodity and the revenue or money to purchase same. Because of this fact, there are many items in society that must be part of our common wealth; paid for and owned by all of us. To believe that the market can address a social issue with no demand (no way to turn a profit), is wishful thinking. If we want the housing issue addressed, we must all have skin in the game, that is, the city must take a more powerful leadership role. The ADU's proposal was not based on economic veracity, nor the scale of the problem, so we are left with the question; is the city serious?
- 3) More problematic was the rationale that ADU's could enhance the revenue stream of individual home-owners and the city as well. Given the "low" number of home-owners who might "invest" in the pursuit of extra income in this way, and the even lower likelihood that the city would enhance its tax revenue simply doesn't pass any economic test. With the exception of a very few personal anecdotes, there is no data to support these claims. As stated in 2 above, if the city wants to address affordable housing or increase its revenues, the straight forward thing to do is to do the research, develop a solid rationale-complete with attending efficiencies, and institute a new city sales tax, tax credits, or enhance other existing taxes to explicitly deal with the issue. Again, housing for the few who can't afford it is a commonwealth issue, far beyond the scope of ADU's.

- 4) There was both concern and hope that higher density in the city would enhance business. It was not clear what, if anything, this assertion had to do with ADU's. More traffic does not, necessarily, translate into more purchases. More traffic may lead to consumer frustration. Nevertheless, this is a good empirical question. But, we have no specific St. Paul data with which to attempt an answer. Other related questions in need of answers might include: * How does public transportation and parking effect the number of customers shopping and dining in the neighborhood? * What income levels support which stores and restaurants? * How do age (children and adults) and health demographics effect shopping patterns?

Population density is not an independent variable in the formula needed to understand how to enhance local businesses. However, one thing we do know about successful community/business relations is the need for reciprocal duty regarding city services and business attention to aesthetics. The beauty of the neighborhood attracts consumers, just as rundown and ugly neighborhoods repel them. A real question that businesses can ask and answer is; how can we, working together with the city, enhance the beauty of the community so that it will attract consumers? In addition, when dealing with a city's sense of place, it is crucial to always be clear regarding the identity, branding, and aesthetic qualities of the city, or neighborhoods therein, so that issues of preservation, destruction, and new construction become transparent and comprehensible. Does the city have a clear statement of identity or vision for St. Paul?

As a citizen of St. Paul, I would hope that future proposals would be better researched, align purpose, principles, and policy, and hold higher opinions regarding the ability of common people to understand, debate, and advise our representatives on matters dealing with quality of life issues that impact us all.

Michael Hartoonian
710 Summit Avenue Apt. 5

Dear Ms. Noecker and the Summit Hill Association:

Thank you for taking the time to read our comments regarding the ADU ordinance coming before the city council regarding Accessory Dwelling Units ("ADUs").

It's clear that more research on the topic needs to be done regarding this short-sighted ordinance. We find it discouraging and irresponsible that the City wants to impose a zoning change on Summit Hill, already one of the densest areas in the city, that disregards its history, all to fulfill the current planning mantra of *density*, while solving none of the City's housing problems.

As we understand it, since 2016, St. Paul has allowed ADUs in a small test area on either side of the Green Line between Lexington and Emerald. Only one ADU has been registered, an 800 square foot over the garage unit that the owner, a contractor, estimates would have cost \$175,000 had he hired all the work (his cost was \$125,000), and that he plans to rent at just under market rate, so it's apparent that ADUs have not been the miracle fix.

With greater density comes more cars, and cars need parking. SHA's recent parking survey demonstrated that there is an increased demand for an inadequate supply of parking in Summit Hill. Density fuels the parking issues that have plagued Summit Hill for decades as evidenced by the large permit parking district and continual efforts to manage parking along Grand and neighboring streets. The City has no parking data - even for Grand, the data is 13 years old and woefully incomplete.

The City tells us that houses in Summit Hill are underutilized, just by looking at them from the outside. This is nonsense, Summit Hill is tied for the third densest area in the city. We are lucky in our neighborhood to have many historic and stately homes, as well as many small houses and apartment buildings that provide affordable housing. The historic nature of the neighborhood is an asset to the city, and it draws many visitors. ADUs, because they can be built anywhere so long as the lot is big enough, will detract from and diminish the character with of the historic neighborhood.

In its drive to increase property taxes, the City will kill the best neighborhoods, ones that feed it so much in tax revenue. If the city wants to destroy the best neighborhoods in the city, please proceed, but our hope and prayer is that the City stops peddling the ADU ordinance in Summit Hill and listens to the property owners.

Very truly yours,

Teagan and Charles Drayton
815 Linwood

SHA Board Members -

I want to express my support for the city-wide expansion of the ADU ordinance as proposed.

I do agree that the process of review by neighborhood associations was flawed; however, I think on balance the substance of the ADU ordinance is a plus for the city in general and for Summit Hill specifically.

I believe it gives the homeowner additional options for sustainable ownership of larger homes and even gives some additional flexibility to the aging demographic that may wish to "age-in-place," as it offers a potentially affordable housing option to a caregiver or property caretaker. In that it provides additional, hopefully affordable, housing options, it can only have a positive effect on diversity in our neighborhood.

Because any new ADU construction will need to be up to current building code, it will be of relatively high quality and will be expensive, thereby limiting the magnitude of the impact on the neighborhood.

Thanks for your consideration of my feedback.

Respectfully,

Frank Zink
852 Lincoln Ave.

Dear Councilperson Noecker and The Summit Hill Association:

After recently listening to city representative Jamie Radel talk about why ADUs should be allowed city-wide, it became clear that the city has done no research on the topic and has only one reason for so hurriedly enacting this short-sighted legislation: it will increase property taxes. The main reason the city gives: there are many illegal ADUs in other parts of the city, so we may as well legalize them city-wide.

The city has a very short memory, but many of us grew up in a Summit Hill and Ramsey Hill that were full of cut up houses, rooming houses, and crime, and we have spent blood, sweat and tears to emerge from those dark days. I find it not only discouraging but irresponsible that the city wants to impose a zoning change on Summit Hill, already one of the densest areas in the city, that disregards its history, all to fulfill the current planning mantra of *density*, while solving none of the city's housing problems.

Since 2016, St. Paul has allowed ADUs in a small test area on either side of the Green Line between Lexington and Emerald. Only one ADU has been registered, an 800 square foot over the garage unit that the owner, a contractor, estimates would have cost \$175,000 had he hired all the work (his cost was \$125,000), and that he plans to rent at just under market rate. ADUs have not been exactly a wild hit, and they have done nothing for the affordable housing needs of our city.

A popular false myth about ADUs is their promotion of intergenerational living. You can already have intergenerational living in St. Paul in houses zoned one family due to the definition of "family" that St. Paul uses that includes more than two generations of lineal descendants, plus four unrelated adults. Today, without any change in the law, you can have your elderly parents and/or grandparents live with you, and they can have their own kitchen. If you prefer, you can give them a bedroom at your house because your parents or grandparents cannot live on their own, are you likely to make them climb the stairs to your over the garage or third floor apartment? Will you really want them to be doing their own cooking?

Asked to identify the city's data that supported the establishment of ADU's city-wide, the city's representative confessed that the city has no data. The only firm fact she could cite was that property taxes will go up because ADU hosts would have a second unit on their property. This would apply to ADUs in the primary dwelling as well as ADUs built in separate buildings or over garages. So not just the stand alone ADU's that might require a \$175,000 investment, but also those in the primary house that might require a smaller investment will see a property tax hike because the city, perhaps wrongly, believes that a cut up house is worth more than a single family one.

The city repeats the often stated myth that all of the homes in Summit Hill were built for servants and so were intended for multiple family units. This is wildly untrue. West of Victoria there are at most a handful of houses that were built with rooms for servants, and throughout the entire neighborhood, a house might have had one tiny bedroom for a servant, usually on the third floor, and very often with no separate plumbing facilities. The single family homes in Summit Hill were built for one family, with one kitchen, and often only one to one and a half bathrooms.

The number of bathrooms--and most of the houses in Summit Hill have added a few--raises the issue of density induced stress on the aging infrastructure of the city. The city discounts any concerns about aging infrastructure, again citing that fact that we have large houses in Summit Hill that used to house larger families. However, many of those larger families got along with one bathroom. Today, St. Paul's water pressure is notoriously low and the electrical grid is so unstable that blocks on Grand have suffered half day blackouts for no apparent reason. Adding to the density of the area through ADUs without massive investment in infrastructure will make our crumbling infrastructure even worse.

Greater density will bring more cars, and cars need to be parked. SHA's recent parking survey demonstrated that there is an increased demand for an inadequate supply of parking in Summit Hill. Density fuels the parking issues that have plagued Summit Hill for decades as evidenced by the large permit parking district and continued efforts to manage parking along Grand and neighboring streets.

The city has no parking data—even for Grand, the data is 13 years old and woefully incomplete. The city has no ideas on how to lessen the parking problem and the only comment the city would make about ADUs adding more stress to parking was that “maybe these people (in ADUs) will take public transit.” Actually, many people who take public transit every day, including me, also have car that needs to be parked.

Some people, based on anecdotal experience, believe that adding ADUs will decrease the value of the surrounding properties. Although the city is certain that addition of an ADU will increase the value of the host property - with no data - the city claims it will have no way of knowing why properties around the ADU host go down in value, “because properties can go up or down in value for any number of reasons.” In fact, this effect can be researched as the data will be readily available. The city believes that if a potential homebuyer does not want to live next door to an ADU, it simply has to research the titles of the neighboring properties to sniff this out. How many people know how to do this research? Hint: it cannot be done on-line.

Apparently, one of the reasons other districts favor ADUs is because of the increase in wealth for the new landlords. No data, once again, and probably no basic research, either. The ADU outside the primary house can be no larger than 800 square feet. Ms. Radel told us that a unit of affordable housing has an average cost of \$180,000, so St. Paul’s one ADU built for \$175,000 is in that range. The monthly debt service on \$175,000 at today’s rates found on the internet is principal and interest of \$1202.64 over 15 years at 2.93% or \$810.00 over 30 years at 3.75%. Add to that the added property taxes and added insurance for maintaining a rental property. What is market rate for 800 square feet without parking or amenities? Not likely enough to service the debt.

The city tells us that houses in Summit Hill are underutilized, again, with no data, just looking at them from the outside. It makes this almost hostile assertion while knowing that Summit Hill is tied for the third densest area in the city. We are lucky in our neighborhood to have many historic and stately homes, for one and two families, as well as many small houses and apartment buildings that provide affordable housing. The historic nature of the neighborhood is an asset to the city, and it draws many visitors. ADUs, because they can be build anywhere so long as the lot is big enough, and because they will require unsightly outside staircases in many instances may very well detract from and need not be in character with the historic fabric of the neighborhood.

One of selling points of ADUs is that they must be owner occupied. What does that mean and how will the city enforce it? First, it will be enforced through neighbors reporting on neighbors. This is how the city is enforcing the Short Term Rental (“STR”) ordinance, and you will notice that while there are dozens of Summit Hill STRs available on-line, only seven of those have been licensed by the city since it required licensing in November 2017. How will neighbors learn whether their neighbors have legal or illegal ADUs? And what is legal? A naïve presumption that everyone who hosts an ADU will comply with the annual registration fee and affidavit that the homeowner lives on the premises fuels the city’s assurances that compliance will be maintained and policed by neighbors. Again, a title search will be necessary as well as a legal analysis of whether the homeowner “lives” on the premises. Asked if this means the owner must live on the premises one day, one month, or not at all, the city referred to the state homestead statute: looks like one day may do it.

In its drive to increase property taxes, the city may very well kill the golden goose that feeds it so much in tax revenue. ADUs should not be imposed upon neighborhoods city-wide, and neighbors should be

notified and have a chance to object if an ADU is to be placed near them. Thank you for taking the time to read my comments.

Sincerely,
Shannon M. O'Toole
223 Avon Street South

Dear Summit Hill Association and Saint Paul City Council:

I'm writing to express support FOR the inclusion of Summit Hill as a neighborhood in which accessory dwelling units are permitted. Indeed, given the large number of carriage houses and other such buildings on properties in the neighborhood, it seems like we should be particularly well suited to having such dwellings and, perhaps more importantly, to use our experience to inform the strict regulation of the terms under which they can be built throughout the city.

Strictly regulated accessory dwellings can enable extended families to live in close proximity, thereby conferring many measurable benefits to grandparents, grandchildren, and parents, for example. Strictly regulated ADUs will increase property tax revenue. Allowing ADUs will also reduce the incentive for tear-downs and dwellings that do not fit plots well.

If Summit Hill does not fully engage at this stage in the development of city-wide policies regarding ADUs, it may find itself having to accept ADUs that are more loosely regulated. That's not good.

I hope SHA takes this opportunity to do this right.

Sincerely,
Sarah West
972 Linwood Ave.

SHA Board and St. Paul City Council:

I write to oppose any city-wide ADU zoning changes. The current proposal should not be applied to districts who oppose the changes, particularly speaking for Summit Hill. I urge the city council to apply reasoned judgement and not change the regulations around ADUs in District 16.

The diversity of the neighborhoods in the city of St. Paul should be recognized, and this cookie cutter, one size fits all solution must not be applied to Summit Hill, a neighborhood known for its wonderful houses, the spacious lots, and the relaxing tree lined streets.

It appears the city council is fixated on revenue and cannot think of other alternatives than density, density, density. Many neighborhoods may benefit from ADUs, but not all, and especially not District 16.

Sincerely,
J Goldberg
1052 Fairmont Avenue

Hi, Why are the large old grand homes with “carriage houses” allowed to operate ADUs freely for profit while everyone else is prohibited? That is not equitable. Thank you.

Mark Abner
968 Fairmount Avenue

It makes great sense to allow Accessory Dwelling Units in Summit Hill. Many houses that were built for the large families of the first part of the 20th Century now have only one or two people living in them (mine included). Often a small amount of remodeling would provide an additional living space. Such units would accomplish several goals, including adding some diversity to our homogeneous community and providing affordable places for millennials to live as they start their careers. If the average age of our population got younger, more people on the streets would diminish the casual street crime we read about in Neighbor to Neighbor. I fully support the idea of ADUs.

P.T. Magee
764 Lincoln Ave

Hello,

I was unable to attend the July 19th meeting, but would like to add my feedback regarding Accessory Dwelling Units.

As a 66 year old Summit Hill resident, I believe that being able to add accommodations for either rental or family or custodial aging-in-the-home help is a good idea, whether it is as standalone new build space or add-on to a garage, or in an existing basement or attic. It is expensive enough living in this district and if there is a way to offset the expense and/or allow people to “age in place” then that is a benefit to both the district, and the tax base.

Could you make a summary of the July 19th meeting available on your website for those of us who could not attend?

Thank you,
Lynn DiEuliis
1033 Fairmount Avenue

Hello –

I'm unable to attend the meeting with SHA, PED, and Rebecca Noecker this evening, but I wanted to voice my support for the expansion of Accessory Dwelling Units to our neighborhood.

I'm a resident and landlord in Summit Hill, my husband Philip Wahlberg own a triplex and live in one of the units, renting out the other two. Before we purchased our triplex, I was a renter in the neighborhood at Lexington & Lincoln. I am a Realtor with Coldwell Banker Burnet and I have seen first hand how increasingly unaffordable St. Paul is for entry-level and middle income homebuyers and renters. Increasing the density of our neighborhoods is a good thing - it will allow homeowners to make additional income to help offset their property tax burden and the expense of owning and maintaining a

home, and it will help house aging family or young adult children (who can't afford to rent or buy their own homes). It's time for progress - and time to try something new!

Sincerely,
Michaela Toohey
1087 Fairmount

Hi,

I'm a summit hill resident and would like to express my favor for expanding the ADU ordinance. I hold a bachelor and masters degree in architecture, which includes the study of urban planning and such policies.

Businesses with a single market are more greatly affected by the sways of opinion and the marketplace. A maker of luxury cars must have consistent high-earning group to be successful. Opinions and markets are inconsistent, which is why every major auto manufacturer offers multiple brands. Diversity similarly benefits a neighborhood from a market perspective. This diversity creates a vibrant culture and sells our neighborhood to a younger audience, increasing the probability that they will continue to socially and financially invest in the neighborhood. One of the things that drew me to Summit Hill was seeing myself reside here for many years.

The light rail is a long way off from achieving the functionality of counterparts in Chicago, Boston, etc. The increased density brought by ADUs is extremely important for a city with limited mass transit options, increasing our flexibility and decreasing our carbon footprint. How many parents would love to skip driving their kids to practice and send them on transit? Who wouldn't want to skip a car payment? Wouldn't you rather be reading a great book than stressing during rush hour?

ADUs expand the housing options and create alternative revenue streams within a historic neighborhood. While there is great beauty in historic architecture, it was also built around a lifestyle which has changed. Adding ADUs provides the flexibility to create interior rentable space, making a more relevant size for modern living, providing additional income, and therefore ensuring that the home can be maintained.

Thanks for your attention to the matter.

Andrew Jacot

Dear Summit Hill Council Members,

I am writing to express my strong opposition to the proposal to expand allowing Accessory Dwelling Units across the City.

The initial study did not include our neighborhood (and others), and therefor the proposal does not consider the many different variables that would make ADUs inappropriate here (and possible elsewhere). My concerns are:

- 1) No consideration has been made for neighborhoods that are historic districts. The creation of new and likely historically unsympathetic structures on lots would have an enormous and negative effect on the neighborhood character. Even if the structures were appealing, their very existence is out of character with most of the blocks here. (An exception being the carriage houses on some of our lots.)

2) There is a clear muddling of interests in the study and proposal - the effort is being framed as increasing housing options and affordability, yet the study suggests these will be related families in one place, and potential short-term rentals (airB&B) in others. Which is it? The lack of a clear purpose or goal weakens the reasoning behind this. There may be better solutions to each of these different issues.

3) Our neighborhood has already one of the highest densities in the city. As one of the oldest, it is already extremely developed. Permanently introducing additional structures, people, and cars with such a broad brush is a really dumb approach. No development policy can be appropriate across the entire city. There are just too many differences.

I strongly object to this policy change happening across the city, and especially in this neighborhood.

Nancy Wagner
1049 Linwood Ave

I am unable to attend the July 19 meeting concerning the Proposed Expansion of Accessory Dwelling Units City-Wide. Per your request, I am sending my comments regarding this issue. Both my husband Gordon and I are opposed to this expansion from a narrow area half a mile on either side of University Avenue along the Green Line from Lexington Parkway and Emerald Avenue to a city wide expansion. There definitely is a lack of transparency around the process of this proposal as well as the substance. The initial study for expansion was limited to Mounds Park and four district councils (1, 3, 7 and 9). The Summit Hill Association was never advised about the proposed city-wide expansion until June 6, 2018. Both my husband and I consider this to be dishonest and deceitful and are opposed to the proposal.

Mary Peters
897 Fairmount Avenue