



## Sustain Saint Paul

Abundant housing, low-carbon transportation, and sustainable land use

October 8, 2021

Attention:

Mr. Michael Wade, Ms. Emma Siegworth, Luis Pereira

Mr. Richard Holst, Chair, Comprehensive and Neighborhood Planning Committee

Mr. Luis Rangel Morales, Chair, Planning Commission

St. Paul Department of Planning & Economic Developments

City Hall Annex

25 West Fourth Street, Suite 1300

Saint Paul, MN 55102

Re: 1-4 Unit Infill Housing Zoning Study – Phase 1 (the “Study”)

Dear All,

We are writing to provide feedback and suggestions related to the Study referenced above, in the hope of driving significant and positive change to the land use regulatory framework for the City of Saint Paul.

We applaud the Planning Commission, its Comprehensive and Neighborhood Planning Committee, and the Department of Planning & Economic Development for tackling these important topics, and for the very thoughtful and detailed work embedded within the Study. We feel there is the potential for meaningful progress to achieving the goals of the approved 2040 Comprehensive Plan and the various City Council Resolutions and policy goals of the City if these recommendations were to be fully implemented, but we also feel the Study falls short on some topics, which we address herein.

The overarching theme of our comments is simple: we must make it easier to build accessory dwelling units in Saint Paul. In the years since our original ADU ordinance was adopted, only a few ADUs have been constructed in the city. Several elements of the current ordinance—especially size

requirements and the owner-occupancy requirement— serve to exclude all but wealthy homeowners living on large lots from building an ADU. These exclusionary requirements must be removed if the ordinance is to achieve its core purpose: to catalyze the construction of low-cost housing units in our city.

This is an historic moment, and St. Paul is at a critical juncture. We are facing a housing crisis, and we have passed one of the most ambitious and visionary Comprehensive Plan documents in at least a generation. The challenge we see is to turn this ambitious vision into the day-to-day and practical reality in our Zoning Code. We encourage everyone, from Planning Commission members to the most junior staff members at PED and DSI, to keep in mind the need for bold action. When it might be comfortable to take a little step forward, please take a giant leap. The will of the people, and the vast majority of elected officials, are fully behind you. The future of our city is at stake. Thank you for taking this Part 1 further and thank you in advance for a bold and transformative Part 2 that is fully aligned with the 2040 Plan and City Council Resolutions.

Thank you for considering our feedback. We are happy to discuss our comments with you in further detail.

Sincerely yours,

Luke Hanson, Co-Chair  
Liz Wefel, Co-Chair  
Melanie Day, Secretary  
Melissa Wenzel  
James Slegers  
Karen Allen

Sustain Saint Paul's Board of Directors

## Appendix A: Proposed Text Amendments and Further Feedback and Suggestions

1. Where can ADUs go?

*We recommend they not be limited just to Rear Yards as proposed. Many side yards are suitable and appropriate.*

2. How tall can they be?

*We recommend a clean-up and simplification of Sec 63.501(e) to something like, "In RL-RM2 residential districts, accessory structures shall not exceed fifteen (15) feet in height and accessory structures containing a dwelling shall not exceed twenty-five (25) feet in height."*

*We don't think it's appropriate to create a different height limit for different roof styles.*

3. How much of a lot can an ADU cover?

*We recommend the size not be tied to the rear yard but that the entire lot coverage be the governing ratio.*

4. What about carriage houses?

*We recommend Section 65.121 be deleted in its entirety. The reference to "domestic employees" is antiquated and adds no value. Importantly, to condition any type of ADU based on what immediate neighbors approve or don't approve is inappropriate to achieve the goals of the 2040 Plan and could lead to civil tensions and unequal opportunities.*

5. How big or small can an ADU be?

*We see no compelling rationale to limit the minimum or maximum size of an ADU. The overall lot coverage, FAR and other limitations of the underlying zoning district should apply. In addition, the building must comply with the specific implementation rules within the then-current Minnesota Residential Building Code, which now allows dwellings to be less than 400 square feet. We see no reason St. Paul should deviate from this state provision.*

6. What about parking?

*Since parking minimums have been eliminated by separate revision to the code, we recommend sections related to parking be updated or eliminated entirely if no longer relevant.*

7. Owner-Occupancy

*Limiting an ADU to households with owner-occupancy is bad policy and does not align with the aspirations of the 2040 Plan or the City Council resolutions. We recommend “studying the elimination of the owner-occupancy provision” be addressed in Part 1 as originally intended, and that the study recommend this provision be eliminated.*

8. Duplex and tri-plex conversion guidelines

*Congratulations on removing these unnecessary constraints to adding more housing in St. Paul! The ability to have two or three households on a lot in this housing format, without regard for owner-occupancy, is another reason the owner-occupancy provision in the ADU ordinance should be eliminated.*