



December 10, 2021

TO: Planning Commission

FROM: Comprehensive & Neighborhood Planning Committee; Bill Dermody, City Planner

SUBJECT: Religious Accessory Uses Zoning Study

ISSUE

On February 1, 2019, a United States District Court settlement agreement became effective that committed the City of Saint Paul to complete a zoning study within three years that “propose(s) amendments to the City’s zoning ordinance to establish a better process for land use applications for religious organizations.” Specifically, clarity is needed for accessory use standards on religious institution properties and the process for their approval.

BACKGROUND

The impetus for the 2019 settlement agreement was a City Council decision regarding First Lutheran Church’s desire to lease space to Listening House for “a low-barrier community center that serves an ethnically diverse group of low-income, homeless or lonely adults” in an RT1 two-family residential zoning district (ZF# 17-060690). City Council approved the use (upon appeal of Planning Commission action¹) as a use similar to other church accessory uses, but with conditions objectionable to the property owner, including some conditions usually applied to home occupations. There were 14 conditions total, the first two of which were rooted in an earlier zoning application at a different church in 2004.

In 2004, the Planning Commission approved a Determination of Similar Use (DSU) to allow a variety of uses (preschool, yoga classes, block nurse offices, music lessons, travel agency, massage therapy) as accessory uses on the St. Mary’s Episcopal Church campus in an R3 one-family residential zoning district in Union Park, finding them similar to other accessory uses to a church, subject to five conditions based partly on the Zoning Code standards for “home occupation”:

1. The tenants are limited to uses that are low profile, generate minimal traffic, are compatible with the church’s presence in the community, and have the potential to complement the activities of the church. Non-profit, community-based organizations are preferred.

¹ The Planning Commission’s 14 approved conditions were similar to the City Council conditions, and were similarly objectionable to the property owner.

2. Tenants shall meet the standards and conditions for "home occupation" as listed in Section 65.141 of the Zoning Code (and below a-k), except that the use is accessory to a church rather than a dwelling unit (and therefore the person conducting the activity need not live on the premises), and that some limited classes may be offered. The standards and conditions for "home occupation" are:
 - a. A home occupation may include small offices, service establishments or homecrafts which are typically considered accessory to a dwelling unit. Such home occupations shall involve only limited retailing, by appointment only, associated with fine arts, crafts or personal services as allowed in the B1 local business district.
 - b. A home occupation shall not involve the conduct of a general retail or wholesale business, a manufacturing business, a commercial food service requiring a license, a limousine business, auto service or repair for any vehicles other than those registered to residents of the property, a motor vehicle salvage operation or a recycling processing center, and shall not involve retailing except as noted in paragraph (a).
 - c. A home occupation shall be carried on wholly within the main building. No home occupation shall be allowed in detached accessory buildings or garages.
 - d. All home occupation activities in dwelling units of less than four thousand (4,000) square feet of total living area, excluding a cellar and attic, shall be conducted by no more than two (2) persons, for one (1) of whom the dwelling unit shall be the principal residence. All home occupation activities in dwelling units of four thousand (4,000) or more square feet of total living area, excluding a cellar and attic, shall be conducted by no more than three (3) persons, for one (1) of whom the dwelling unit shall be the principal residence.
 - e. No structural alterations or enlargements shall be made to the dwelling for the primary purpose of conducting the home occupation.
 - f. Service and teaching occupations shall serve no more than one (1) party per employee at a time and shall not serve groups or classes.
 - g. There shall be no exterior storage of equipment, supplies or commercial or overweight vehicles as defined in Chapter 151 associated with the home occupation, nor parking of more than one (1) business car, pickup truck or small van, nor any additional vehicles except those for permitted employees identified under paragraph (d).
 - h. There shall be no detriments to the residential character of the neighborhood due to noise, odor, smoke, dust, gas, heat, glare, vibration, electrical interference, traffic congestion, number of deliveries, hours of operation or any other annoyance resulting from the home occupation.
 - i. A home occupation may have an identification sign no larger than two (2) square feet in area, which shall not be located in a required yard.
 - j. Home occupations for handicapped persons that do not meet these conditions may be reviewed by the board of zoning appeals, which may modify or waive requirements (a) through (g).
 - k. For the purposes of this section, "principal residence" shall mean the dwelling where a person has established a permanent home from which the person has no present intention of moving. A principal residence is not established if the person has only a temporary physical presence in the dwelling unit.
3. Tenants offering group lessons or classes are limited to one class at a time with no more than 10 people. The type of class offered should be limited to activities that generate minimal noise and are not disruptive to the surrounding neighborhood.
4. To prevent congestion of surrounding streets and to minimize traffic disruption to the neighborhood, no more than one day care business is permitted.

5. The church shall work with their tenants to prevent scheduling of multiple events and classes that, taken together, would generate considerable traffic and congest neighborhood streets.

The first two conditions applied to St. Mary's (including subconditions 2a-2k) have since been applied to several other religious institutions' accessory uses via Statements of Clarification issued by the Zoning Administrator, as authorized by Zoning Code Sec. 61.106.

Saint Paul is home to scores – perhaps hundreds – of religious institutions, with a variety of accessory uses. Common accessory uses at religious institutions are child day cares, preschools, elementary schools, and food shelves. Other accessory uses found at religious institutions in St. Paul include offices, an Irish dance school, adult day care, after-school programming, counseling, self-sufficiency education, emergency overnight shelter for limited numbers of people, and the above-noted uses at First Lutheran Church and St. Mary's Episcopal Church. There are probably other accessory uses that do not make it to official zoning records, such as group counseling sessions, community meetings, and small receptions.

There are also religious institutions that have collocated with other principal uses that were not determined to be accessory uses, but were permitted through other means as principal uses. Examples in Saint Paul include a music school and a bowling alley.

Religious uses enjoy special legal protections. Besides the United States Constitution and an abundance of associated case law, the Religious Land Use and Institutionalized Persons Act (RLUIPA) could particularly apply to this zoning study and future land use decisions based upon it. RLUIPA forbids a local government from land use regulation that imposes a substantial burden on religious exercise, unless the government can demonstrate that it is furthering a compelling government interest through the least restrictive means possible.

The current City process to evaluate proposed accessory uses to religious institutions is:

1. If the proposed use is permitted in the site's zoning district as a principal use, then it is permitted as a second principal use on the site. (This is often the case in mixed use, business, or industrial zoning districts.)
2. If the proposed use is not permitted in the site's zoning district as a principal use (as is often the case in residential zoning districts) and is not customarily or has not previously been approved as an accessory use by the Department of Safety and Inspections for a religious institution, then it must receive either a Statement of Clarification from the City's Zoning Administrator or a Determination of Similar Use (DSU) from the Planning Commission.
 - a. There is no application form nor fee for a Statement of Clarification. Rather, the applicant provides a letter to the Zoning Administrator that describes the use, and the Zoning Administrator issues a Statement of Clarification if it is deemed similar to a previously approved accessory use. (Several Statements of Clarification have been issued for accessory uses to a religious institution that were deemed similar to the 2004 St. Mary's Episcopal Church DSU.)
 - b. If the Zoning Administrator deems that the proposed use is not similar to a previously approved accessory use, then the user or property owner can apply for a DSU by the Planning Commission. (No DSUs for accessory uses to a religious institution have been applied for since the 2004 St. Mary's Episcopal Church DSU approval.)

PUBLIC HEARING TESTIMONY

The proposal released for public review and comment at the October 29 public hearing created a definition and standards for “religious institution accessory uses” that listed many common uses at religious institutions as falling under the definition. Religious institution accessory uses were proposed to be allowed in all zoning districts that permit religious institutions. Through that definition and standards, three limitations on uses were proposed: (1) emergency shelter capped at 10 adults plus children in their care, (2) a conditional use permit (CUP) required for social and community services over 1,000 square feet, and (3) a prohibition on new buildings or building additions primarily for the accessory use’s purpose. The third limit, regarding new buildings/building additions, was struck from consideration at the beginning of the hearing.

Sixteen people spoke at the public hearing and written testimony was received from more than 150 people. Much of the testimony was general, on the theme of being opposed to the proposal and/or to any zoning regulation of religious institutions. More specific testimony included:

- The prohibition on new buildings or building additions for accessory uses is unduly burdensome for less established and growing religious institutions, many of whom serve newer immigrants and people of color.
- Many of the uses listed as “accessory” are considered primary to the missions of the religious institutions, by the institutions themselves and their congregations.
- Religious institutions provide many needed community services that are valuable to the surrounding neighborhoods and complement government efforts.
- Religious institutions often have multipurpose spaces for a variety of gatherings and events, whether for the congregations or for the broader neighborhood.
- Mosques do not want to face a public process for CUPs because of potential discrimination.
- The CUP requirement for “social and community services” needs to be eliminated or adjusted. If kept, then the 1,000 square foot threshold should be increased and “social and community services” needs to be defined better and as narrowly as possible, because many services provided by religious institutions could be construed as social and community services.
- Make it clear that the uses are examples, and it’s not limited to only those uses.
- Food distribution should not be limited.
- Allow for “accessory dwelling units” (ADUs) and/or tiny houses.
- One congregation plans to construct a senior care facility on its campus.
- It should be made clear that nonconforming uses are allowed to continue.
- Shift the focus to meeting religious institution needs without disrupting the neighborhoods.
- Have a reduced CUP fee for religious institutions.

A letter from the Macalester-Groveland Community Council echoed some of the above issues, and also was the only testimony that suggested a stricter regulation:

- Require supervision for the purposes of security in and around overnight shelters, when in use.

No other neighborhood district councils provided testimony.

TESTIMONY ANALYSIS

Overall, testimony revealed that the proposal released for public review was overly restrictive for religious expression and created confusion in several ways, including what would require a conditional use permit and where the line is drawn between “accessory” and “principal” use. It also revealed that religious institutions provide a wide variety of services that benefit the larger community and do not (or are not foreseen to) produce significant negative neighborhood impacts (with the possible exception of overnight

shelters). In response to this testimony, it is recommended that the amendments be organized more simply and that restrictions be eased.

RECOMMENDED AMENDMENTS

The Comprehensive and Neighborhood Planning Committee and staff recommend code amendments that allow most desired uses at religious institutions via two means: an expanded “religious institution” definition, and a reworked “community center” definition and standards based on the current “noncommercial recreation” definition. The definition for “religious institution” is expanded to make clear that gathering spaces, education facilities, and other activities directly associated with religious exercise are part of the use. A community center, which would be permitted without a conditional use permit when operated by religious institutions, government agencies, and other tax-exempt organizations in all zoning districts that religious institutions are permitted, is proposed to include a broad range of activities, including dance classes, day care, public health services, social services, legal clinics, performances, receptions, and more that commonly occur at religious institution campuses. Community centers not run by a religious institution, government agency, or other tax-exempt organization would generally require a conditional use permit. Notably, a community center run by a religious institution, government agency, or other tax-exempt organization could provide space to another type of organization, for example a local attorney to host a legal clinic, a medical clinic to hold a blood drive, or a dance teacher to instruct a class.

Additionally, the code amendments would have the impact of relaxing regulations on City-operated community and recreation centers. Currently, such centers must abide by standards including being located on a major thoroughfare (arterial street) and having landscaped yards, and require a conditional use permit in residential districts. In practice, many such centers are not located on arterial streets and are not known to cause significant problems for surrounding neighborhoods – recent conditional use permits have been very routine. As recreation-oriented uses, the centers readily provide sufficient landscaping and would almost certainly continue to do so without this code standard. The Parks and Recreation Department’s thorough public design process generally identifies and addresses community concerns well before a conditional use permit is applied for, making the discretionary CUP process unnecessary as a practical matter.

Four other uses are handled in other ways: preschool/day care, overnight shelter, homeless services facility, and emergency housing. The “day care” definition is amended to allow them to be located in not only a former religious institution, but also a current one. It is also clarified that the definition includes preschools. “Overnight shelter” for up to 25 adults plus minor children in their care at a religious institution and “homeless services facility” accessory to a religious institution are added to the list of accessory uses in Legislative Code Sec. 65.910. The regulations for “emergency housing” are amended to allow it by-right at a religious institution throughout the city, without numerical or separation limits (although, of course, all other codes and regulations would apply such as building code and fire code, which could be burdensome and costly if the occupancy is more than temporary and triggers a “change of use”– including issues such as sprinklers, kitchen upgrades, and sewer access charges).

One set of uses, those equivalent to home occupations like a small accounting office or travel agency, would not be specifically addressed by these code amendments. However, these uses would continue to be allowed in religious institutions located in zoning districts where these uses are listed as permitted uses, while in other zoning districts can easily continue to be approved through a Statement of Clarification from the Zoning Administrator. Such uses that are truly equivalent to home occupations are unlikely to cause any neighborhood issues or be unable to meet the home occupation standards.

One use raised in testimony, voting, is already permitted citywide via Legislative Code Sec. 60.107.

Residential uses such as accessory dwelling units and senior care facilities are not addressed in the recommended amendments. Such uses would be allowed on or adjacent to religious institution campuses only as usually permitted by the underlying zoning. Adult care homes, for instance, are allowed in most zoning districts, with a limit of 6 residents in RL-RT1 residential districts, a limit of 16 residents in RT2-RM1 residential, T1 traditional neighborhood and OS-B2 business districts, and no limit in other zoning districts.

The recommended approach will create clarity for religious institutions considering new uses, both in terms of process and allowable uses. For most uses that the City sees at religious institutions, the use will simply be permitted. There would no longer be a Statement of Clarification needed for most uses, nor would uses need to abide by ill-fitting conditions derived from home occupation standards.

COMPREHENSIVE PLAN ANALYSIS

Comprehensive Plan Policy LU-7 calls for using “land use and zoning flexibility to respond to social, economic, technological, market and environmental changes, conditions and opportunities.” The recommended amendments make it easier for religious institutions to adapt to modern needs and opportunities. They also simplify the process for City community recreation centers, recognizing that some of their current zoning standards are outdated and unnecessary.

RECOMMENDATION

The Comprehensive and Neighborhood Planning Committee and staff recommend that the Planning Commission approve the attached resolution that recommends approval of zoning code amendments regarding religious accessory uses.

ATTACHMENTS

1. Draft Planning Commission resolution
2. Public Hearing written testimony

city of saint paul
planning commission resolution
file number _____
date _____

WHEREAS, the United States District Court settlement agreement for Case No. 18-cv-00954 requires the City of Saint Paul to “initiate and proceed with... a zoning study to propose amendments to the City’s zoning ordinance to establish a better process for land use applications for religious organizations”; and

WHEREAS, the Zoning Code lacks clear standards for accessory uses on religious properties; and

WHEREAS, on January 24, 2020, the Planning Commission passed Resolution 20-07 initiating a zoning study to consider amendments to the Zoning Code pertaining to accessory uses on religious properties, and other connected regulations contained in the Zoning Code; and

WHEREAS, the Saint Paul Planning Commission held a duly noticed public hearing regarding potential zoning amendments regarding religious institution accessory uses; and

WHEREAS, the Comprehensive and Neighborhood Planning Committee of the Saint Paul Planning Commission, having reviewed the public hearing testimony and a memorandum containing analysis provided by staff, provided a recommendation for consideration by the Saint Paul Planning Commission; and

WHEREAS, the Saint Paul Planning Commission, having reviewed the public hearing testimony and the Comprehensive and Neighborhood Planning Committee’s recommendation, finds the proposed text amendments to be supported by the policies of the Comprehensive Plan.

NOW, THEREFORE, BE IT RESOLVED, by the Saint Paul Planning Commission, under the authority of the City’s Legislative Code, that the following proposed amendments to the Legislative Code are recommended for approval by the Mayor and Council of the City of Saint Paul:

moved by _____

seconded by _____

in favor _____

against _____

Religious Institution Accessory Uses Proposed Code Amendments

Existing language to be deleted shown by ~~strikeout~~. New language shown by underlining.

Chapter 65. Zoning Code—Land Use Definitions and Development Standards

ARTICLE II. 65.100. RESIDENTIAL USES

Division 3. 65.150. Congregate Living

Sec. 65.154. Emergency housing facility.

One (1) main building, or portion thereof, on one (1) zoning lot where persons who do not have housing live on a 24-hour-per-day basis until more permanent arrangements can be made, but generally for no longer than thirty (30) days.

Standards and conditions:

- (a) In RL-RT2 residential, OS office-service, B1 local business, IT transitional industrial, F1 Ford river residential, and F5-F6 Ford districts the use shall be located on the same zoning lot as a religious institution.
- (b) In the I2 general industrial district the use requires a conditional use permit. In RM1-RM3 residential, T1-T4 traditional neighborhood, BC-B5 business, I1 light industrial, and F2-F4 Ford districts the use requires a conditional use permit if not located on the same zoning lot as a religious institution.
- ~~(c) See section 65.162, supportive housing facility, standards and conditions (a)–(d). If not located on the same zoning lot as a religious institution, the use shall be subject to standards and conditions (a)-(d) for supportive housing facility, section 65.162.~~

ARTICLE III. 65.200. CIVIC AND INSTITUTIONAL USES

Sec. 65.221. Community center.

A facility that may include such things as recreational and cultural facilities, gymnasiums, swimming pools, outdoor recreation, meeting rooms, performance space, social service facilities and public health facilities. A community center may provide for such things as art, music, dance, adult and general education classes; child and adult day care; counseling; public health and social services; legal clinics; civic events; community meetings; performances; and receptions.

Standards and conditions:

- (a) Unless operated by a religious institution, other tax-exempt organization or a government agency, the use requires a conditional use permit in residential districts. A community center operated by a religious institution, other tax-exempt organization or a government agency may provide space for other types of organizations.

(b) A conditional use permit is required for the use in the I2 general industrial district.

Sec. 65.221222. Day care.

The care of one (1) or more children on a regular basis, for periods of less than twenty-four (24) hours per day, in a place other than the child's own dwelling unit. Day care includes family day care, group family day care and child care centers, as hereinafter defined.

- (1) *Family day care.* A day care program providing care for not more than ten (10) children at one (1) time, and which is licensed by the county as a family day care home. The licensed capacity must include all children of any caregiver when the children are present in the residence.
- (2) *Group family day care.* A day care program providing care for no more than fourteen (14) children at any one (1) time of which no more than ten (10) are under school age and which is licensed by the county as a group family day care home. The licensed capacity must include all children of any caregiver when the children are present in the residence.
- (3) *Child care center.* A day care program licensed by the state or the city as a child care center. Child care centers include programs for children known as nursery schools, day nurseries, child care centers, play groups, day care centers for school age children, after school programs, infant day care centers, cooperative day care centers, preschool and Head Start programs.

Standards and conditions:

- (a) In RL—R4 residential districts, a child care center shall be located in a nonresidential structure currently or formerly occupied by a church, community center, school or similar facility. In industrial districts, a child care center shall be accessory to a principal use permitted in the district.
- (b) A fence at least three and one-half (3½) feet in height shall surround all play areas located in a front yard or adjacent to a public or private street.

...

Sec. 65.235. ~~Recreation, noncommercial, Reserved.~~

~~Recreational areas including private, noncommercial recreation areas, institutional, municipal or community recreation centers, and nonprofit swimming pool clubs.~~

~~*Standards and conditions in residential districts:*~~

- ~~(a) The proposed site for any of the uses permitted herein shall have at least one (1) property line abutting a major thoroughfare (in definition), and the site shall be so planned as to provide principal access directly to said major thoroughfare.~~
- ~~(b) All yards shall be landscaped in trees, shrubs and grass. All such landscaping shall be maintained in a healthy condition. There shall be no parking or structures permitted in these minimum yards, except required entrance drives and those walls used to obscure the use from abutting residential districts.~~
- ~~(c) Whenever a swimming pool is constructed under this subparagraph, said pool area shall be provided with a protective fence, six (6) feet in height, and entry shall be provided by means of a controlled gate.~~

Sec. 65.236. Religious institution.

A church, chapel, synagogue, temple or other similar place of worship, along with uses directly associated with religious exercise and the place of worship such as a rectory, parsonage, convent, monastery, gathering spaces, and religious retreat and education facilities.

ARTICLE VII. 65.900. ACCESSORY USES

Sec. 65.910. Accessory use or accessory.

A building, structure or use which is clearly incidental to, customarily found in connection with, and (except as provided in section 63.300) located on the same zoning lot as, the principal use to which it is related.

When "accessory" is used in the text, it shall have the same meaning as "accessory use."

An accessory use includes, but is not limited to, the following:

- (a) Accessory off-street parking spaces, open or enclosed, subject to the accessory off-street parking regulations for the district in which the zoning lot is located.
- (b) Accessory off-street loading, subject to the off-street loading regulations for the district in which the zoning lot is located.
- (c) Domestic storage in a barn, shed, tool room or similar accessory building or other structures including the storage of antique and classic automobiles within accessory structures.
- (d) Storage of merchandise normally carried in stock in connection with a business or industrial use, unless such storage is excluded in the applicable district regulations.
- (e) Storage of goods used in or produced by industrial uses or related activities, unless such storage is excluded in the applicable district regulations.
- (f) Trash containers, including garbage dumpsters, in accordance with chapter 357 of the Saint Paul Legislative Code.
- (g) Accessory signs, subject to the sign regulations for the district in which the zoning lot is located.
- (h) Uses clearly incidental to a main use such as, but not limited to, offices of an industrial or commercial complex; greenhouses accessory and incidental to a florist; and auto rental accessory and incidental to a hotel or railroad passenger station.
- (i) Residential accommodations for servants or caretakers located within the main dwelling and without separate cooking facilities.
- (j) Swimming pools for the use of the occupants of a residence or their guests.
- (k) A newsstand primarily for the convenience of the occupants of a building which is located wholly within such building and has no exterior signs or displays.
- (l) A small brewery operated in conjunction with a bar or restaurant provided the beer is sold for consumption on the premises and not sold to other bars, restaurants or wholesalers, except that an

Rectory, parsonage	P	P	P	P	P	P	P	(s)
Convent, monastery, religious retreat	P	P	P	P	P	P	P	(s)
School, <u>grades K-12 primary & secondary</u>	P	P	P	P	P	P	P	(d), (s)

P - Permitted use C - Conditional use requiring a conditional use permit

Notes to table 66.221, principal uses in residential districts:

- (d) Definition for the use in Chapter 65, Land Use Definitions and Development Standards.
- (s) Standards and conditions for the use in Chapter 65, Land Use Definitions and Development Standards.

ARTICLE III. 66.300. TRADITIONAL NEIGHBORHOOD DISTRICTS

Sec. 66.321. Principal uses.

Table 66.321, principal uses in traditional neighborhood districts, lists all permitted and conditional uses in the T1—T4 traditional neighborhood districts, and notes applicable development standards and conditions.

Table 66.321. Principal Uses in Traditional Neighborhood Districts

Use	T1	T2	T3	T4	Development Definition (d) Standards (s)
Residential Uses					
<i>Congregate Living</i>					
Emergency housing facility	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	(d), (s)
Civic and Institutional Uses					
<i>Educational Facilities</i>					
<i>Social, Cultural, and Recreational Facilities</i>					
Club, fraternal organization, lodge hall		P	P	P	(d)
College, university, seminary, etc.	P	P	P	P	(d), (s)
<u>Community center</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	(d), (s)
Day care	P	P	P	P	(d), (s)
Museum	P/C	P	P	P	(s)
Public library	P	P	P	P	
Public and private park, playground	P	P	P	P	
Recreation, noncommercial	P	P	P	P	(d)
<i>Religious Institutions</i>					
<u>Religious institution Church, chapel, synagogue, place of worship</u>	P	P	P	P	(d)
Rectory, parsonage	P	P	P	P	(s)
Convent, monastery, religious retreat	P	P	P	P	
School, <u>primary & secondary grades K-12</u>	P	P	P	P	(s)
Trade school, arts school, dance school, etc.	P	P	P	P	

P - Permitted use C - Conditional use requiring a conditional use permit

Notes to table 66.321, principal uses in traditional neighborhood districts:

- (d) Definition for the use in Chapter 65, Land Use Definitions and Development Standards.
- (s) Standards and conditions for the use in Chapter 65, Land Use Definitions and Development Standards.

ARTICLE IV. 66.400. BUSINESS DISTRICTS

Sec. 66.421. Principal uses.

Table 66.421, principal uses in business districts, lists all permitted and conditional uses in the OS—B5 business districts, and notes applicable development standards and conditions.

Table 66.421. Principal Uses in Business Districts

Use	OS	B1	BC	B2	B3	B4	B5	Definition (d) Standards (s)
Residential Uses								
<i>Congregate Living</i>								
Emergency housing facility	<u>P</u>	<u>P</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	(d), (s)
Civic and Institutional Uses								
<i>Educational Facilities</i>								
<i>Social, Cultural, and Recreational Facilities</i>								
Club, fraternal organization, lodge hall				P	P	P	P	(d)
College, university, seminary, etc.	C	C	C	C	C	C	C	(d), (s)
<u>Community center</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>(d), (s)</u>
Day care	P	P	P	P	P	P	P	(d), (s)
Museum						P	P	
Public library	P	P	P	P	P	P	P	
Public and private park, playground	P	P	P	P	P	P	P	
Recreation, noncommercial	P	P	P	P	P	P	P	(d)
<i>Religious Institutions</i>								
<u>Religious institution Church, chapel, synagogue, place of worship</u>	P	P	P	P	P	P	P	<u>(d)</u>
Rectory, parsonage	P	P	P	P	P	P	P	(s)
Convent, monastery, religious retreat	P	P	P	P	P	P	P	
School, <u>grades K-12 primary & secondary</u>	P	P	P	P	P	P	P	<u>(s)</u>
Trade school, arts school, dance school, etc.	P	P	P	P	P	P	P	

P - Permitted use C - Conditional use requiring a conditional use permit

Notes to table 66.421, principal uses in business districts:

- (d) Definition for the use in Chapter 65, Land Use Definitions and Development Standards.

- (s) Standards and conditions for the use in Chapter 65, Land Use Definitions and Development Standards.

ARTICLE V. 66.500. INDUSTRIAL DISTRICTS

Sec. 66.521. Principal uses.

Table 66.521, principal uses in industrial districts, lists all permitted and conditional uses in the IT—I3 industrial districts, and notes applicable development standards and conditions.

Table 66.521. Principal Uses in Industrial Districts

Use	IT	I1	I2	I3	Definition (d) Standards (s)
Residential Uses					
<i>Congregate Living</i>					
Emergency housing facility	<u>P</u>	<u>P/C</u>	C		(d), (s)
Civic and Institutional Uses					
<i>Educational Facilities</i>					
<i>Social, Cultural, and Recreational Facilities</i>					
Club, fraternal organization, lodge hall	P	P	C		(d)
College, university, seminary, etc.	P	P	C		(d), (s)
<u>Community center</u>	<u>P</u>	<u>P</u>	<u>C</u>		<u>(d), (s)</u>
<u>Child care center</u> <u>Group day care</u>	P	P	C		(d), (s)
Museum	P	P	C		
Public library	P	P	C		
Public and private park, playground	P	P	P		
—Recreation, noncommercial	P	P	P		(d)
<i>Religious Institutions</i>					
<u>Religious institution</u> <u>Church, chapel, synagogue, place of worship</u>	P	P	C		<u>(d)</u>
School, <u>grades K-12 primary & secondary</u>	P	P	C		<u>(s)</u>
Trade school, arts school, dance school, etc.	P	P	C		

P - Permitted use C - Conditional use requiring a conditional use permit

Notes to table 66.521, principal uses in industrial districts:

(d) Definition for the use in Chapter 65, Land Use Definitions and Development Standards.

- (s) Standards and conditions for the use in Chapter 65, Land Use Definitions and Development Standards.

ARTICLE IX. 66.900. FORD DISTRICTS

Sec. 66.921. Ford district use table.

Table 66.921, Ford district uses, lists all permitted and conditional uses in the F1-F6 Ford districts, and notes applicable development standards and conditions.

Table 66.921. Ford District Uses

Use	F1	F2	F3	F4	F5	F6	Definition (d) Standards (s)
Residential Uses							
<i>Congregate Living</i>							
Emergency housing facility	<u>P</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P</u>	<u>P</u>	(d), (s)
Civic and Institutional Uses							
Club, fraternal organization, lodge hall		P	P	P	P		(d)
College, university, specialty school		P	P	P	P	P	(d), (s)
<u>Community center</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>(d), (s)</u>
Day care, primary and secondary school	<u>P</u>	P	P	P	P	P	(d), (s)
Public library, museum	P	P	P	P	P	P	
Public and private park, playground	P	P	P	P	P	P	
Recreation, noncommercial		<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>(d)</u>
Religious institution, place of worship	P	P	P	P	P	P	(d)
<u>School, primary and secondary</u>		<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	<u>P</u>	

P—Permitted use C—Conditional use requiring a conditional use permit

Notes to table 66.921, Ford district uses:

- (d) Definition for the use in Chapter 65, Land Use Definitions and Development Standards.
- (s) Standards and conditions for the use in Chapter 65, Land Use Definitions and Development Standards.



October 27, 2021

Mr. Bill Dermody
St. Paul Planning Commission
City Hall Annex
25 W 4th St., Suite 1300
St. Paul, MN 55102

Dear Mr. Dermody:

Per the commission's "Notice of Public Hearing – Religious Accessory Uses Zoning Study" and per your invitation for comments to the same, I am writing to add my name to the attached document submitted to you by Roger Rehbein of Our Saviour's Lutheran Church (674 Johnson Pkwy., St. Paul).

Heartily echoing the entirety of Mr. Rehbein's observations and rationale, I want to reinforce a couple items of particular concern to me:

- The language offered in the proposed amendments is both extraordinarily broad in its application, while simultaneously extraordinarily vague.
 - How would any church subject to these amendments be able to act in (literal) good faith, while pursuing ministries under them we have already conducted for years?
 - If implemented as proposed, these amendments would place an extraordinary administrative and financial burden on non-profit, small-staffed organizations already providing the city and its citizens with myriad services which compliment larger social service organizations.
- Therefore, as Mr. Rehbein notes (points 6 & 7) the amendment language appears to violate and contradict that of the "Religious Land Use & Institutionalized Persons Act" (RLUIPA).

Bethel Lutheran has been a proud and integral part of the St. Paul community since 1931. We continue to enjoy solid partnerships with the city and strive to be an asset to all neighbors in the Como Park area and beyond.

~ 2 ~

My request of you and the commission is to table this issue until: a) further intentional conversation can be had with a host of St. Paul faith leaders, and; b) some agreement in principle for proposed amendments can be arrived at prior to proceeding to hearings and a vote on them.

Continued thanks to you and the members of the commission for your service to the City of St. Paul.

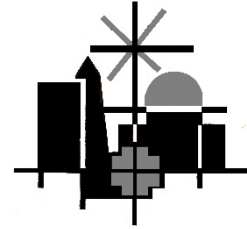
Cordially,

A handwritten signature in blue ink, appearing to read "Andrew Prin".

Rev. Andrew Prin
Senior Pastor
Bethel Lutheran Church
670 W Wheelock Pkwy.
St. Paul, MN 55117
(612) 868-0927 [direct]
andrew.bethelstp@gmail.com [email]

bethlehem lutheran in the midway

436 Roy Street North
Saint Paul, MN 55104
www.bethlehem-midway.org
651-646-6549



October 27, 2021

Dear Planning Commission,

I am writing to you in regard to the proposed “Religious Accessory Uses Zoning Study” that is under consideration by the Planning Commission on Friday, October 29. I write to urge you to reject this proposal and step away from future proposals that would – in any way – regulate the freedom of religious communities in the City of Saint Paul.

The draft of the proposal that has been presented is extraordinarily ambiguous; there are unresolved questions regarding the freedom of new and emerging communities of faith, the definition of “social and community services” (proposed section 5b), and how and what powers the Planning Commission may have over the activities of religious institutions.

I offer an example. On May 28, 2020, Bethlehem Lutheran Church in the Midway was contacted by local faith-based organizers regarding using the space for respite for neighbors affected by smoke, tear gas, and pepper spray during the uprising-related events at the Midway Shopping Center and along University Avenue. Without question, we said yes because we believe that we are compelled by our faith commitments to offer shelter to those in need. What began as a respite site quickly morphed into a food distribution site, which provided food, basic household supplies, and baby supplies to approximately 17,000 individuals in need, during the time that our local grocery stores and mass transit were closed. My understanding of the proposal means that doing this necessary community work—which was done out of a deep faith commitment to feed the hungry, per Matthew 25:35 (for I was hungry and you gave me food, I was thirsty and you gave me something to drink, I was a stranger and you welcomed me...), among many other Scriptural directives, would have required a conditional use permit, which, presumably, could not have been issued in the *minutes* it took for us to offer our otherwise empty space to neighbors in need.

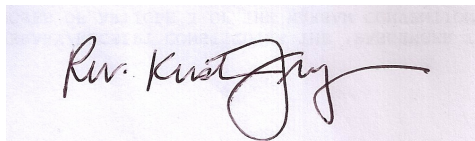
Further, Open Hands Midway has been located in our building since 2009. What began as a ministry of the congregation has grown into a fully operating 501(c)3, providing meals and a food shelf to hundreds of community members each month. In the summer of 2020, we recognized that the need for a new food shelf space was great and were able to use existing space to create a new food shelf area that allows guests to “shop” for themselves, picking their

own food and household supplies. It is dignified and welcoming. Under the proposal, would we need a conditional use permit, since modifying this space within our existing building might put us over the 1000 square foot threshold that is set?

New construction aside, houses of worship are currently able to use existing space, which so often stands empty outside of regular worship and education times, to act nimbly and quickly to address community needs. While it could be argued that these are “existing” programs, in many cases they are not and grow out of the relationships we grow with our neighbors and the ways we can (and should!) love our neighbors. As I understand it, this proposal would make this quick response impossible, potentially preventing our most vulnerable neighbors to receive necessary services, such as food and emergency shelter or prolonging the time until such necessary services can be provided by our houses of worship, who are already equipped *and* compelled by religious belief to do so. While existing programs may be grand-fathered in, this proposal makes it difficult, if not impossible, for new programs, partnerships, and community-based response to do the work they are called to do by their own religious conviction.

I understand the need for clarification, but this proposal is ambiguous and steps into unprecedented regulation of religious institutions in the City of Saint Paul. I urge you to reconsider or better yet, step away from any proposed zoning that attempts to regulate how houses of worship utilize their spaces in direct service to our community, as we are compelled to do by our Scriptural and faith tenants.

Best,

A handwritten signature in black ink on a light-colored background. The signature reads "Rev. Kirsten Fryer" in a cursive, flowing script.

Rev. Kirsten Fryer
Pastor, Bethlehem Lutheran Church in the Midway
436 Roy St. N.
St. Paul, MN 55104

Cc. Bishop Patricia Lull
Saint Paul Area Synod, ELCA



SAINT PAUL AREA SYNOD
EVANGELICAL LUTHERAN CHURCH IN AMERICA

105 WEST UNIVERSITY AVENUE ST. PAUL, MN 55103-2094
651.224.4313 | FAX 651.224.5646 | WWW.SPAS-ELCA.ORG

October 29, 2021

The Saint Paul City Planning Commission,

I serve as the Bishop of the Saint Paul Area Synod of the Evangelical Lutheran Church in America, which includes well over 100,000 baptized members, belonging to congregations in Ramsey, Washington, Chisago and Dakota Counties. Two dozen of those communities of faith are within the City of Saint Paul. I attended the public hearing with members of the Planning Commission on Friday, October 29 and was impressed by the careful listening, the voiced commitment to work with the diverse religious community in Saint Paul, and the proposal for a follow-up meeting to be hosted by Interfaith Action.

As Bishop of the Saint Paul Area Synod, I am deeply concerned by any zoning decision that would limit the ability of a congregation to go about its faith-based activities. This includes the discussion underway, which proposes the necessity of a Conditional Use Permit for certain new or expanded functions of Houses of Worship in residential districts.

I am a resident of Saint Paul and appreciate the growth of our city over the past 167 years. Many Houses of Worship are located in what are now designated as residential districts, having been built in the day when neighbors walked to services. Over the decades, through waves of immigrants and changing demographics, these Houses of Worship continue to serve as community assets and anchors in their neighborhoods.

The “Religious Accessory Uses Zoning Study”, as proposed, does not adequately define what counts as “social and community services”. In our Christian tradition, the following are asked of all baptized members: *“to live among God’s faithful people, to hear the word of God and share in the Lord’s supper, to proclaim the good news of God in Christ **through word and deed, to serve all people, following the example of Jesus, and to strive for justice and peace in all the earth.**”* We do not distinguish between worship, religious education, and social and community services, but count all as aspects of Christian life and learning. I don’t know how a city would enforce a special category for “social and community service” functions in a residential district without violating the provisions of the Religious Land Use and Institutionalized Persons Act.

When Planning Director, Bill Dermody was asked at an information session on October 21, 2021 about comparable zoning restrictions in other cities the size of Saint Paul, he said there were none. That suggests that there should be no requirement for a Conditional Use Permit in our city for these two essential functions of Houses of Worship.

Whether in a residential or other district demarcation, the physical building and activities of each House of Worship are already governed by required building permits and occupancy limits, as established for safety reasons. These also cover the maximum capacity standards for

housing the homeless, making the stated limitation of 10 adults unnecessary. Those safety, fire, and building code regulations are the only restrictions that make sense for Houses of Worship and the use of their property and buildings for primary or assessorly purposes. Referral to the "home occupation" regulations as a "similar use" is a poor analogy and serves no useful purpose in clarifying the standards for allowable assessorly use of a House of Worship.

I recommend that the Planning Commission drop this part of the proposal immediately, recommending to the City Council that all functions, permitted by fire and safety mandates and building codes, be allowed by Houses of Worship in residential, traditional neighborhood, and business districts, as well as the new Ford district.

Sincerely,



The Rev. Patricia J. Lull, Bishop

patricia.lull@spas-elca.org

651-236-0208

St. Paul Planning Commission
c/o Bill Dermody
City Hall Annex
25 West 4th Street
St. Paul, MN 55102

Re: Public Comment on Proposed Ordinance Amendments – Religious Access Zoning Study

By: Undersigned Religious Institutions

Date: October 28, 2021

Dear Planning Commission:

We, the undersigned members of the city’s faith community, write to provide comments on the “Religious Accessory Uses Zoning Study” that will be the subject of a “Public Hearing” scheduled for October 29, 2021 at 8:30 A.M

The proposed amendments to Secs. 65.916 of the City Code (referred to herein as the “Proposed Amendments”) strike at the heart of one of our greatest American civil liberties: the right to free exercise of religion.

For our faith communities, service and works are vitally critical. This basic belief is core to who we are.

In Saint Paul, our religious organizations provide food shelves, shelters (day and night), and community centers where young people, old people, and everyone in between, can receive care and feel welcome. Of course, ours and many other religious organizations also use their space to teach. The diversity and richness of the faith community – and the different ways that we each live out our missions – make it impossible to even begin to categorize all the land uses that could be impacted by the Proposed Amendments.

Deciding which land uses are “primary” and which are “accessory” may have salience for City administrators. But politically and legally, this is fraught terrain for the City. The Proposed Amendments give the City an impermissibly large role in deciding when and under what circumstances religious activities will be permitted in St. Paul.

There are limits on the right to free exercise, of course. We are not suggesting that any regulation of religious exercise is improper.

But there are clear and bright-line limits on a city’s ability to regulate religious land uses. These limits come from the U.S. Constitution’s Free Exercise Clause, the Minnesota Constitution, and federal law (including the Religious Land Use and Institutionalized Persons Act, or RLUIPA).

Under any of these measures, the City's actions are unlawful. The Proposed Amendments establish a new category of zoning that applies only to religious institutions, in order to further restrict religious land uses, in a way that expressly targets religious (and not secular) uses. Even worse, the City appears to be doing all this without any good or understandable reason.

The truth is, many of the services provided by faith communities are ones that the City either cannot or does not support. Often, these programs serve the neediest and most vulnerable among us.

We urge the City to reverse course and reconsider its ill-advised Proposed Amendments. Further travel down this road will lead only to wasted time, resources, and legal fees, and an inevitable loss by the City. The City and its taxpayers – regardless of their religious beliefs – deserve better. We stand willing to work with the City to craft a reasonable, fair, and just zoning code amendment that does not unduly burden religious institutions in St. Paul.

(Signature page follows.)

Respectfully,

ARCHDIOCESE OF ST. PAUL AND MINNEAPOLIS

By: Michael Tix
Name: Rev. Michael Tix
Title: Episcopal Vicar for Clergy and Parish Services
Address: 777 Forest St., St. Paul, MN 55106

JEWISH COMMUNITY RELATIONS COUNCIL OF MINNESOTA AND THE DAKOTAS

By: _____
Name: Ethan Roberts
Title: Director of Government Affairs
Address: 12 N. 12th St. Suite 480, Minneapolis, MN 55403

ST. PAUL JEWISH FEDERATION

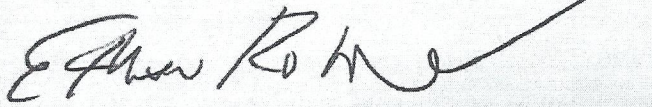
By: Ted Flaum
Name: Ted Flaum
Title: Chief Executive Officer
Address: 790 S. Cleveland Ave., Suite 227, St. Paul, MN 55116

Respectfully,

ARCHDIOCESE OF ST. PAUL AND MINNEAPOLIS

By: _____
Name: Rev. Michael Tix
Title: Episcopal Vicar for Clergy and Parish Services
Address: 777 Forest St., St. Paul, MN 55106

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ST. PAUL JEWISH FEDERATION

By: _____
Name: Ted Flaum
Title: Chief Executive Officer
Address: 790 S. Cleveland Ave., Suite 227, St. Paul, MN 55116



Monday, November 1, 2021

Chair Rangel Morales and Members of the Planning Commission:

Hazel Park Congregational United Church of Christ located on the Eastside of St. Paul works closely with our community partners in trying to meet the needs of many. As one of the faith community members in the East Metro area, we support what Interfaith Action of Greater Saint Paul (IFA) as outlined below and join our voice with theirs. Thank you for the opportunity to comment on the proposed Religious Institution Accessory Uses Code Amendments.

We attended the clergy engagement session with Planner Bill Dermody and hosted by IFA . Mr. Dermody made a thorough presentation of the proposed amendments and carefully explained the purpose. We are especially grateful to Mr. Dermody for his time and effort.

In considering the zoning code amendments and the new definition of “Religious institution accessory use” (Zoning Code Sec. 65.916) we would urge the Planning commission to consider and take into account the following:

Non-conforming uses. It should be made clear that current legal uses of property by religious institutions (whether permitted uses, conditional uses or legal nonconforming uses) may be allowed to continue even if they are considered to be an accessory use in the future.

Modify the list of “accessory uses”.

- **“But not limited to”.** Make it clear that the list of uses is not exhaustive, but shows a comprehensive list of allowed uses.
- **Define “social and community services”.** There should be an objective definition of this term so that everyone has a clear understanding of what is, and is not, allowed.
- **10 adults in emergency shelter.** This would not work well for IFA’s Project Home shelters located in a house of worship (HOW). Typically these shelters had 20 beds, often more than 10 adults. We suggest a limit of 25 people.
- **Accessory Dwelling Units (ADU).** Religious institutions who have a desire to directly address the lack of affordable housing and the great need for stable housing for those most in need, may wish to use new flexible housing options. Consider including accessory dwelling unit as an allowed accessory use if it otherwise conforms to other requirements of the zoning code and building code.



- **Non-religious accessory uses.** Accessory uses are defined in section 65.910 of the Zoning Code. It should be clear that these uses continue to be available for religious institutions. Note that food shelf is already an allowed accessory use for a religious institution (65.910(o)).

Standards and conditions.

- **No new building.** This condition is not reasonable and would be difficult to enforce. It should be deleted. Many of the IFA members are very troubled by a prohibition on new construction to house a use that the code allows.
- **"1,000 square feet".** The 1,000 square foot dividing line on permissible/impermissible is troubling. Imagine a legal clinic with a client family, two lawyers, and paralegal all in one room trying to maintain social distancing. Or other uses with even more people in the space during COVID. Several of our faith leaders mentioned this as too restrictive.
- **CUP Fee.** The cost of the conditional use permit process is a burden on HOWs. We would propose this fee should be *de minimus* for the faith communities.

Other.

- **PED Staff.** The application of these new zoning rules to an already complicated zoning code is difficult to understand for many of the houses of worship. They would like to be assured that the resources and expertise of the planning staff would be available to them to assist as needed.
- **Clarify "P/C."** For example there is explanation needed about when is it "P" and when is it "C" in the religious institution accessory use line of the residential chart. It should be clearly explained.

Again, thank you for your time and consideration of this important matter.

Sincerely,

A handwritten signature in black ink that reads 'Rev. Sara E. Morse'. The signature is written in a cursive style and is placed over a light yellow rectangular background.

Reverend Sara E. Morse, Pastor



October 29, 2021

Dear Saint Paul Planning Commission,

We appreciate the section A amendment (65.919) being removed from the Religious Institution Accessory Uses Proposed Code Amendments that would've prohibited a food shelf operating in a church from building new or adding additions to their current building to better serve the needs in their community. We don't want to make it more difficult for food shelves in St. Paul to provide emergency services, especially with needs growing across the state. In 2020, food shelves across Minnesota served a record level of over 3.8 million visits.

Hunger has reached unprecedented levels, including approximately 1 in 5 Minnesotans experiencing food insecurity and nearly double that rate for communities of color. Now is not the time to make it more of a challenge for food shelves to operate and help families struggling to make ends meet. Thank you again for withdrawing this amendment.

Please contact Peter Woitock pwoitock@hungersolutions.org or 651-789-9850 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Colleen Moriarty". The signature is written in a cursive, flowing style.

Executive Director, Hunger Solutions
Minnesota



October 29, 2021

Chair Rangel Morales and Members of the Planning Commission:

Thank you for the opportunity to comment on the proposed Religious Institution Accessory Uses Code Amendments. Interfaith Action of Greater Saint Paul (IFA) has nearly 100 faith community members in the East metro area. IFA is a non-profit agency dedicated to *mobilizing diverse faith and spiritual communities to engage in work that supports our neighbors' stability and economic mobility*. Among other several other programs that live out this mission, IFA operates Project Home, a family emergency shelter program.

Because our members include churches and other types of houses of worship (synagogues, temples, and hopefully soon, mosques), we refer to the members as houses of worship (HOWs).

IFA recently hosted a clergy engagement session with nearly 70 of our member HOWs represented. At that session Planner Bill Dermody made a thorough presentation of the proposed amendments and carefully explained the purpose. We are especially grateful to Mr. Dermody for his time and effort.

In considering the zoning code amendments and the new definition of "Religious institution accessory use" (Zoning Code Sec. 65.916) we would urge the Planning commission to consider and take into account the following:

Non-conforming uses. It should be made clear that current legal uses of property by religious institutions (whether permitted uses, conditional uses or legal nonconforming uses) may be allowed to continue even if they are considered to be an accessory use in the future.

Modify the list of "accessory uses".

- **"But not limited to"**. Make it clear that the list of uses is not exhaustive, but shows a comprehensive list of allowed uses.
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Other.

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- **Clarify “P/C.”** For example there is explanation needed about when is it “P” and when is it “C” in the religious institution accessory use line of the residential chart. It should be clearly explained.

Again, thank you for your time and consideration of this important matter.

Very truly yours,



Brian D. Alton
Board member of Interfaith Action of Greater Saint Paul



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

651-695-4000
mgcc@macgrove.org

October 28, 2021

Saint Paul Planning Commission
City Hall, Room 40
15 Kellogg Blvd.
Saint Paul, MN 55102
VIA EMAIL

Re: Proposed Religious Institution Accessory Uses Code Amendments

Dear Saint Paul City Planning Commission Members:

On October 28th, 2021, the Housing and Land Use Committee of the Macalester Groveland Community Council ("MGCC") held a public eMeeting via Zoom, at which it considered the *Proposed Religious Institution Accessory Uses Code Amendments* to Chapter 65 of the Zoning Code – Land Use Definitions and Development Standards.

Prior to the meeting, MGCC received 1 letter in opposition of the proposed amendments. One non-voting community member, representing a faith institution in Mac-Grove, spoke in opposition to the proposed amendments.

After considering neighborhood feedback, consulting the Macalester Groveland Long Range plan, and reviewing the proposed amendments, the Housing and Land Use Committee passed the following resolution by a final vote of 15-2, with 1 abstention:

**** The Housing and Land Use Committee of the Macalester-Groveland Community Council recommends denial of the Proposed Religious Institution Accessory Uses Code Amendments, with a recommendation to revise amendment language, including:**

- 1. Removal of (a) *No building additions or new buildings may be constructed for the primary purpose of conducting a religious institution accessory use,***
- 2. Clarification of (b) as to which uses require a Conditional Use Permit, and**
- 3. Expansion of (4) to require supervision for purposes of security in and around overnight shelters, when in use. ****

Important to the decision were the following considerations:

- Concern over the level of engagement done with Saint Paul faith institutions and community members.

- A lack of information for the aforementioned groups on the intended and potential unintended consequences of these proposed amendments.
- A lack of clarity in the amendment language on the services allowed or disallowed by faith institutions.

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



Alexa Golemo
Executive Director
Macalester-Groveland Community Council

cc (via email): Ward 3 Office, City of Saint Paul
Ward 4 Office, City of Saint Paul
Luis Pereira, Planning Director
Bill Dermody, City of Saint Paul PED

NOV 01 2021

ATTN: Saint Paul Planning Commission
RE: Religious Accessory Uses

Dear Saint Paul Planning Commission,

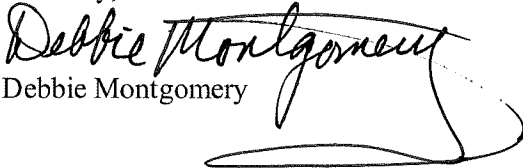
Having served both on the City Council as the representative for Ward 1 and as a police officer for the Saint Paul Police, it is my view that government and public service should be just that, a service to the public. However, after reviewing the proposed Religious Institution Accessory Uses Code Amendments, it seems that you do not share this view. These proposed amendments, especially Section 65.919, Standards and conditions: (a). "No building additions or new buildings may be constructed for the primary purpose of conducting a religious institution accessory use." are overly broad and restrictive to the point of harming the public and the common good.

For example, I am a parishioner of The Church of Saint Peter Claver in Saint Paul. The Church has four buildings: The main church building, the rectory/office building, the Loyola Spirituality Center, and the Saint Peter Claver School building. Under this new proposed code, if we wanted to build a gym for our school we could not. If we wanted to tear down the old office building a new convent to house religious sisters from Africa to help teach in our school, we could not. If we wanted to tear down the rectory and the Loyola Spirituality Center to build a new senior care facility, which would provide key medical care for our aging black seniors right in our Rondo neighborhood, we could not. In the end, if these proposed amendments are passed as they are, then we would only be able to rebuild a new church building, forcing us to eventually close our school and lose our priest, functionally closing the church.

This proposed change also seems to discriminate against the practice of our religion and puts the determination of what is "primary" and what is "accessory" to religion in the hands of the state, which not only violates the separation of Church and State but is also a violation of our First Amendment right to freedom of religion. Who is the state to tell us what is primary to our religion and what is accessory? It is primary for us to follow our religion by living out the words of Jesus Christ, who said to care for the sick, the elderly, the poor, the orphan.

In addition, this proposed amendment further disenfranchises the minority groups in Saint Paul, especially those that rely on the "accessory" care given by religious institutions. The senior care facility at St. Peter Claver is the perfect example. We have been working towards this for years. It would not only help bring stability to one of the pillars of the already oppressed Rondo community, but it would also help to further the advancement of our community through providing more jobs in our neighborhood, which were taken from us when I-94 was put in, and affordable housing for our Black seniors to be able to stay in our neighborhood, instead of being forced to move out of the neighborhood when they cannot live on their own any longer. This amendment should not be passed. Please do what you can to serve us and treat us and our religious institutions justly.

Sincerely,


Debbie Montgomery



November 1, 2021

St. Paul Planning and Economic Development
Attn: Bill Dermody
25 West 4th Street, Suite 1300
Saint Paul, MN 55102

Chair Rangel Morales and Members of the Planning Commission:

Thank you for your service to the City of St. Paul and your care for its residents. We appreciate the opportunity to comment on the proposed Religious Institution Accessory Uses Code Amendments. Like many other St. Paul faith communities, we strongly oppose the proposed amendments.

Mosaic Christian Community, a Church of the Nazarene, exists to mobilize and equip the community of Christ into a lifestyle of hospitality. We are a group of people from all different ethnic and cultural backgrounds, representing many generations, with different educational and economic experiences — all coming together as disciples of Jesus Christ to love one another and serve our neighbors on the East side of St. Paul. Our church property is in a residential neighborhood and we are truly a neighborhood church -- our staff lives here, our children play here. We consider our neighbors friends and welcome their feedback and involvement with our community events.

While we work tirelessly to care for our neighbors, we feel the city is increasingly making our mission more difficult to carry out. These proposed zoning code amendments could directly affect our ministry. The city has an opportunity to repair its relationship with faith communities on the heels of the First Lutheran settlement, but these proposed amendments only further the divide.

Although ostensibly, the goal of these proposed amendments was to bring “clarity” to the zoning code, it instead imposes many barriers for small, growing faith communities. The Religious Land Use and Institutionalized Persons Act requires better from the city. Rather than impose barriers like a confusing and time-consuming Conditional Use Permit application, the city should be working with faith communities to make sure they have the processes in place to aid in their service to the neighborhood.

Although we are glad to see that the ban on new construction provision has been struck from the original proposed amendments, it is greatly concerning that it was ever included to begin with. All of these proposed amendments, particularly the extreme 1,000-square-foot requirement and the 10-person shelter limitation, are indications that the city is struggling to understand the mission of its faith community, does not yet appreciate the necessity of the work of the faith community in its city, and does not take RLUIPA seriously.

We encourage you to consider how the city can *help* its faith community, rather than increasingly *hinder* us.

Sincerely,

Meredith Campbell
On behalf of Mosaic Christian Community
540 E Wheelock Parkway
St Paul, MN

October 28, 2021

Luis Rangel Morales
Chair, Saint Paul Planning Commission
500 Laurel Avenue
Saint Paul, MN 55102

Dear Chair Morales and Commissioners:

We have serious concerns regarding the proposed ordinance regarding a zoning study for religious accessory use. We think this is an unfair targeting of religious institutions of all faiths. The notice as presented by the Planning Commission comes at a time of a global pandemic where religious institutions are at the forefront supporting their members during a most stressful time. This would divert our scarce resources away from the communities we serve to address this ordinance (e.g., attending meetings, etc.). This is not good public policy.

We oppose the ordinance to restrict the ability of churches and all houses of worship to serve those in need. **We also oppose the moratorium on new construction as too restrictive.** We do not see the future but need to be ready for events of the future. For example, during the pandemic people were isolated and cut off from all traditional forms of support. We need to keep our capacity to innovate to serve our communities. During the pandemic, for instance, some churches converted their parking lots temporarily to serve as spaces for worship. We respect the wishes of our neighbors, many of whom are our parishioners, to enjoy the quietness and sanctity of their homes. We will include them in any plans to meet the needs of the future. Please do not constrain our ability to innovate and serve those greatest in need through this overly restrictive ordinance.

The zoning study rightfully expresses the desire not to conflict with the Religious Land Use and Institutionalized Persons Act. We believe that the provision with a moratorium on new construction for religious accessory use calls into question compliance with the Religious Land Use and Institutionalized Persons Act.

We respectfully request you to strip the provision with the moratorium on new construction in residential neighborhoods from the proposal.

Thank you.

Rev. Dr. Brian L. Friedrich
Resident, Lex Ham Neighborhood
President, Concordia University-St. Paul

Kassim Busuri
Executive Director,
Minnesota Dawah Institute, Saint Paul

Rev. Joe Gifford
Pastor, St. Peter Catholic Church

Rev. Dr. Lucas Woodford

President, Minnesota South District
The Lutheran Church—Missouri Synod

Rev. Nickolas Kooi
Pastor
Emmaus Lutheran Church
Saint Paul, Minnesota

Rev. Dr. Joshua C. Miller
Pastor
Jehovah Lutheran Church
Saint Paul, Minnesota

Rev. Steven M. Bielenberg
Senior Pastor
King of Kings Lutheran Church and School
Roseville, Minnesota
Circuit Visitor
Saint Paul Metro Circuit of LCMS Churches

Rev. Vue Lee
Associate Pastor
King of Kings Lutheran Church and School
Roseville, Minnesota
Chaplain
Ramsey County Sheriff's Department

Rev. Steven Mark Benson
Senior Pastor
Eastern Heights Lutheran Church
Saint Paul, Minnesota

Rev. Chuck Fenton
Associate Pastor
Eastern Heights Lutheran Church
Saint Paul, Minnesota

Rev. Brian Scoles
Pastor
Our Saviour's Lutheran Church
Saint Paul, Minnesota

Rev. Richard Her
Pastor
Hmong Lutheran Church
Saint Paul, Minnesota

Dr. James Seemann

CSP Faulty Emeritus
LCMS Missionary to Prison and Correctional Ministries
Saint Paul, Minnesota

Dr. David Mennicke
Resident, Lex Ham Neighborhood
Professor of Music
Concordia University, St. Paul

DCE Shelly Schwalm
Resident, Lex Ham Neighborhood
Ministry Associate
Concordia University, St. Paul

Dr. Bruce P. Corrie
Concordia University, Saint Paul

Rev. Dr. David Lump, Professor Emeritus
Concordia University, Saint Paul, Minnesota

Dr. Shirley Miske, CEO
Miske Witt & Associates International Inc.

Michael Essien
Trustee, St Peter Claver Church

CC. Mayor Melvin Carter
Deputy Mayor Jaime Tincher
Council President, Amy Brendmoen
Councilmember Dai Thao
Councilmember Mitra Jalali
Councilmember Rebecca Noecker
Councilmember Jane Prince
Councilmember Chris Tolbert
Councilmember Nelsie Yang
Commissioner Anne DeJoy
Commissioner Kristine Grill
Commissioner Nathaniel Hood
Commissioner Richard Holst
Commissioner Libby Kanter
Commissioner Garrison McMurtrey
Commissioner Deborah Mitchell
Commissioner Steven Moore
Commissioner Nieeta Presley
Commissioner Jacob Reilly
Commissioner Jeffrey Risberg
Commissioner Omar Syed

Commissioner Simon Taghioff
Commissioner Seanne Thomas

Planning Director, Luis Pereira
Planning Commissioner Secretary, Sonja Butler

Contact: Dr. Bruce Corrie, Professor of Economics, 651 641 8226, corrie@csp.edu

To: Planning Commission c/o Bill Dermody

From: Roger Rehbein
Vice President of Our Saviour's Lutheran Church
674 Johnson Parkway, St. Paul, MN 55106

Subject Religious Institution Accessory Uses Proposed Code Amendments

Date: October 27, 2021

It appears that the Proposed 65-916 paragraph to Chapter 65 of the City's Legislative Code will not allow building additions or new buildings for some activities for a religious institution and will require the religious institution to ask the City for permission to conduct other activities.

The September 9, 2021 letter from the Comprehensive & Neighborhood Planning Committee to the Planning Commission stated that "clarity is needed". Clarity on this issue has not been achieved by the proposed code amendments.

According to the proposed changes, Sec. 65.919 Religious Institution Accessory Uses include:

- (1) Child and adult day care; art, music, dance, adult and general education classes; after-school programs; religious education classes.
- (2) Community center, community meeting and performance space, receptions.
- (3) Counseling, social and community services.
- (4) Emergency housing and overnight shelter for up to ten (10) adults, along with any minor children in their care.
- (5) Food shelf.

I offer the following comments in support of my claim that clarity has not been achieved:

1. "*Standards and conditions*" sub-paragraph (a) within this paragraph makes it clear that the intention is that no building additions or new buildings may be constructed for the primary purpose of conducting the types of uses listed in items (1) through (5) above. Many churches try to use their space for multiple purposes. Where this is the case, it will be difficult to say what the "primary" purpose is for a building addition or new building.
2. "*Standards and conditions*" sub-paragraph (b) will require a conditional use permit in residential districts for social and community services (where more than 1000 square feet are dedicated to those uses). "Social and community services" are also called out in sub-paragraph (3) above. From this, I infer that items (1), (2), (4) and (5) above, and also "Counseling" in sub-paragraph (3) will not be required to have conditional use permits. Also, keep in mind that with many spaces having multiple uses, it will be difficult in some instances to say whether a space is "dedicated" to a particular use.

3. If items (1), (2), (4) and (5) above, and also "Counseling" in sub-paragraph (3) do not need a conditional use permit in residential districts, there is no definition of what is meant by "Social and community services". What guarantee is there that the items listed in items (1), (2), (4) and (5) above and also "Counseling" in sub-paragraph (3) will not be considered "Social and community services"? If these items are not considered "Social and community services", the proposed changes give no hint as to what types of social and community services will require a conditional use permit. This lack of clarity is problematic. The other "Accessory Uses" in Article VII – 65.900 have far more definition as to what is meant by the items listed in the Accessory Use Tables listed in Chapter 66. This makes the City's intent unclear.
4. It is not clear as to when a use as identified in Table 66.221 is a "permitted use" vs when a conditional use permit is required. Cells in Table 66.221 with a P/C are unclear as to what the City will require, or as to how that determination is made.
5. The Explanatory letter of September 9, 2021 from the Comprehensive & Neighborhood Planning Committee to the Planning Commission regarding the "Religious Accessory Uses Zoning Study" states the following in the "ANALYSIS" section of the letter; "For most religious accessory uses that the City sees, the use will simply be permitted." Contrast that statement with the Footnote definition "P- Permitted Use" in the Uses Tables in Chapter 66 of the St. Paul Legislative Code. There the "P" is defined as "Permitted Use". At issue here is whether the religious institution has to ask permission to do the items listed in the Proposed Sec 65.919 paragraph, or if the uses are simply allowed by the definition of the use. For example, the religious institutions should not have to ask the City for permission to perform religious education classes on its premises.
6. According to RLUIPA, the burden the government puts on parties affected by land use restrictions must be "the least restrictive means of furthering that compelling governmental interest". I would submit that these rules are not the "least restrictive" means of furthering the City's interest. For example, if vagrancy is an issue near a church's property, the State's Vagrancy statute should be enforced. If public urination or defecation on peoples' nearby property is an issue, the State's Indecent Exposure statute should be enforced. Keep in mind that for issues like this, the Religious Institution's aim is to help the homeless, and the destitute, not enable them.
7. According to RLUIPA, "No government shall impose or implement a land use regulation in a manner that treats a religious assembly or institution on less than equal terms with a nonreligious assembly or institution." Since these rules by their very nature put special rules in place for religious institutions that are more restrictive than rules for a non-religious use or institution (see Table 66.221 in the City's legislative code), I believe these rules are in violation of RLUIPA.
8. It would have been helpful in reviewing these proposed changes to have the specific United States District Court settlement agreement available which committed the City to the Zoning Study and which is mentioned in the ISSUE Section of the September 9, 2021 letter from the Comprehensive &

Neighborhood Planning Committee. No instructions were given in the September 9 letter for how to find the specific language of the agreement. Having the specific agreement available would have allowed the reviewers to comment on whether they thought the City of St. Paul had adequately followed through on their part of the agreement.

The “accessory uses” listed in the proposed Sec 65.919 are hardly an "accessory" to many Religious Institutions. The uses listed in the proposed 65.919 will always be found in an active faith community. My faith calls me and others like me to **do** these activities. An active faith community will always have “doers” and not just “hearers” of what is taught in a religious institution.

Roger Rehbein
Vice-President of Our Saviour's Lutheran Church
674 Johnson Parkway
St. Paul, MN 55106
(Church member in St. Paul since 1979)



October 28, 2021

Saint Paul Planning Commission
C/O Bill Dermody
15 Kellogg Blvd W
Saint Paul, MN 55102

Dear Mr. Dermody,

The Saint Paul Area Association of Realtors® (SPAAR) is a professional organization of over 7,900 Realtors® in 12 Minnesota counties and 200+ cities and townships. SPAAR's Realtor® members and staff are committed to working with you to further strengthen Minnesota's vibrant communities through the dream of homeownership and sustainable community development.

SPAAR is opposed to the Saint Paul Planning Commission's proposed amendment to Zoning Code Chapter 65: Religious Institution Accessory Uses Code. The community would be negatively impacted in these ways:

1. These proposed amendments would infringe private property rights. These amendments would give the City of Saint Paul unconstitutional power over diverse religious institutions' use of their property.
We are concerned this violates the Fourteenth Amendment right to equal protection.
2. Many Saint Paul citizens receive support from community religious institutions. These institutions provide much-needed resources: daycare services, education, counseling, overnight shelters, food shelves, and other critical supports. These amendments would create barriers to providing these crucial services to Saint Paulites. The lengthy list of restricted uses (Sec. 65.919) places burdensome controls on these institutions.
An expanding daycare would be unable to serve the needs of the community.
3. Saint Paul's population is expanding; the City has focused attention on affordability in housing. Increased population and housing opportunities will necessitate increased need for community services including those provided by religious institutions as accessory uses. The proposed amendments will create roadblocks to providing these services.
In addition to current services and programs, religious institutions may need flexibility to provide new services not envisioned by these amendments.

These amendments would make a significant impact on the citizens of Saint Paul and the ability of diverse religious institutions to provide valuable resources and services to the community. SPAAR strongly encourages you to reconsider these amendments and the unintended consequences that they would have on the communities in Saint Paul.

Sincerely,

Mary Knudsen
2021 Government Affairs Committee Chair
Saint Paul Area Association of Realtors® (SPAAR)

October 31, 2021

To: Chair Rangel Morales and Members of the Planning Commission

I am writing in response to the Proposed Religious Institution Accessory Uses Code Amendments. I attended an information session hosted by Interfaith Action of Greater St. Paul and am grateful to city planner Bill Dermody for taking the time to explain the rationale and background for this proposal as well as to seek comment.

I understand and support the need for clearer guidance around zoning and religious accessory use given that the current standard used is based on a home standard, which doesn't quite fit for a religious institution. I appreciate the efforts the city has made over the years to work within the framework it had to make possible various accessory uses possible. I also understand a neighborhood's interest in maintaining a residential character within reason. At the same time, I am deeply concerned about the potential for use of this amendment as written to enforce a "not-in-my-backyard" kind of mentality.

First, let me state that I whole heartedly support the comments and suggestions offered by Interfaith Action. I will not repeat them all, but would like to highlight a few areas of specific concern to me based on my experience as a School Sister of Notre Dame involved in religious ministry, a member of a Catholic parish, and as a social worker who has often provided social services in spaces provided by churches.

I was glad to read in Saturday's paper that the limit on new construction for religious education was removed. That seemed to me to be a clear violation of the religious rights of houses of worship to fulfill their religious mandate to educate their children and adult members in the faith.

It should be noted, however, that even for new construction, the religious purpose of these buildings is often limited to a few days a week and that houses of worship, as good stewards of the resources God has given them, often would like to offer these spaces to other community groups and social outreach/social service ministries when they are not being used for their religious education purposes.

Apart from new construction for religious education, I also believe that the ban on new construction for "accessory" purposes as well as the limits on use of existing property for services such as social and community services, housing the homeless, food shelves, etc. are likely to be challenged in court. It is a deeply held religious belief that feeding the hungry, sheltering the homeless, clothing the naked, caring for the widow, the orphan, the oppressed, etc., are an essential part of our religious practice and worship and are included in various forms in our religious texts. They are not considered "accessory" in our minds and hearts.

Beyond this, the services we offer as houses of worship, benefit the City of St. Paul and the neighborhoods in which we offer these types of services. St. Paul does not have the money or

capacity to care for the needs of all the people. If we did not attend to these needs, crime, poverty, illness, hunger, unattended youth and homelessness would be even worse than they are. I currently live in an apartment. Behind my apartment building in the trees/park and around tree lined areas of the streets in my neighborhood, I periodically encounter homeless people sleeping and regularly encounter them asking for alms on the street corners. Would that there were a church in my neighborhood that had a shelter for them! I would feel safer than wondering who I might meet in my parking lot or on the street at night. St. Paul needs the services its houses of worship offer, needs our creativity and commitment. Our communities would be worse off without them and the partnerships they create. Generally speaking, members of houses of worship are very willing to work with the city and with neighbors to find common ground. We will challenge, however, the “not-in-my-backyard” syndrome.

Very specifically, I support:

- Removal of language banning new construction, which discriminates against houses of worship razing and building new buildings that better serve a need and against newer houses of worship that are only beginning their outreach. Houses of worship should be able to use their property for outreach services in accord with their mission.
- For homeless programs, 10 adults is not sufficient. I ran a homeless shelter in another community in a former convent. It is difficult to know the ratio of adults to children. A better measure is to set a cap for total number of people – a reasonable amount for many shelters, such as the churches used for Interfaith Action, former convents converted into homeless shelters, etc. would be 25 people.
- An allowance for other types of creative housing on the property of houses of worship. Some communities are considering tiny houses on wheels to provide more permanent housing for the homeless and having congregational members living on the grounds in community with them to provide support. This is a super-creative approach that could address some significant housing needs and provide the human support to help make it successful for hard to house individuals.
- Clear definition of what constitutes social/community services – and a broad understanding of what is allowed, including recognition that the list doesn’t include all possibilities. Needs change, houses of worship are creative. Also, 1000 sq. feet is insufficient. Again, in many of our minds this is an essential part of our religious practice and we are likely to defend it in court if pushed to that.
- Continued allowances for the renting of space to other community-type services, such as music, dance and exercise classes, ESL and GED classes, small non-profits that need low-rent spaces to get started or to continue to be able to offer services. Most houses of worship have parking space, so that should not be an issue in a neighborhood. Or perhaps being able to offer parking is a condition for group type of services.
- Need to clearly address one-time events, such as vaccine events, dental clinics, blood drives. Houses of worship have been key sites in our current pandemic vaccine response. Where do these fit in the accessory use plan? It is not clear.

I understand there are some time-limits involved in this process due to the court order. I am unclear, given that I read the court order came in Feb. of 2019, before COVID, how it is that this draft is coming so late and with so little time for real dialogue with religious communities. My hope is that either much substantive conversation happens quickly or that an extension is requested from the courts, with the challenges of COVID being presented as a delaying factor perhaps. It would be a waste of so much time, effort and finances to end up with more litigation in the courts. Some of our deeply held values are being touched on here. I have no doubt that faith communities would much rather address these issues in dialogue and a mutual search for the common good.

Thank-you for your time and attention to this matter.

Sincerely,

Handwritten signature of Stephanie Spandl, SSND.

Sister Stephanie Spandl, SSND, LICSW

sspandl@ssndcp.org

260 Osceola Ave. S. #120

St. Paul, MN 55102

November 1, 2021

To: Chair Rangel and members of the St. Paul Planning and Economic Development Commission

Re: Religious Accessory Users Zoning Study – Comments on behalf of St. John the Evangelist Episcopal Church, St. Paul, MN

cc: Rev. Jered Weber Johnson, Rector and Sarah Dull, Executive Administrator

I am C. Robert Beattie, legal counsel, former officer and long-time member of St. John the Evangelist Episcopal Church located at 60 Kent Street, St. Paul, Minnesota, 55102 (the “Church”). I am submitting these comments with regard to the proposed amendment to the St. Paul Zoning Code adding a new Section 65-918 regarding Religious Institution accessory use (the “Amendment”).

The Church is affiliated with Interfaith Action, in particular serving as a site for the operation of Project Home, a family emergency shelter program. In that regard the Church joins in the comments on this topic submitted by Interfaith Action, in particular those requesting the following:

- * Revision of the proposed Amendment to make clear that the list of permitted accessory uses is not exclusive but merely a list of examples of permitted activities

- *Increasing the number of adults allowed to participate in an emergency shelter program such as Project Home from 10 to 25

- * Making clear that Accessory Uses allowed under Section 65.910 are also permitted for Religious Institutions

We have significant concerns about the following aspects of the proposed Amendment:

- ***Use of the term “social and community services” in Standards and Conditions clause (b).** Many have noted that term needs to be defined. We agree but doubt that a definition will adequately address what is intended to be accomplished by that clause and the Amendment as a whole. As initially drafted clause (b) threatens to severely restrict social service programs offered by religious institutions. Faith based social service facilities have been held to be within the scope of exercise of religion protected by the Religious Land Use and Institutional Persons Act (“RLUIPA”) and thus must be afforded the protections of that act by having any restrictions or requirements related to those activities be by the least restrictive means. While Standard and Condition (c) of the Amendment acknowledges that fact, the statement of the obvious does not offer any clarity on how anyone is to operate under the Amendment.

Merriam Webster defines social service as “an activity designed to promote social well-being”, a very broad definition. Indeed many, if not all, of the various activities permitted under the Amendment without compliance with clause b fall within the common definition of “social and community services”. Yet, the list of permitted activities is hardly an exhaustive catalog of social services. The commission’s commentary, but not the Amendment itself, acknowledges

that clause b is not to apply to the listed activities found elsewhere in the Amendment. That is a limited step toward recognizing the types of social services provided by religious institutions, but clause b takes a large swath of activities away from that recognition by using an overly broad term, which cannot be readily understood, to impose restrictions on the provision of social services. If the idea of the Amendment is to allow religious institutions to continue to provide social services, which most religious institutions consider an essential part of their faith, in a manner that they have done from time immemorial, without burdensome restrictions, the list of permitted activities should be made as broad as possible. That laudable goal can be best achieved by revising the introduction to the Amendment to provide that the list of permitted social and community services includes, but is not limited to, those enumerated in the clauses that follow. The application of clause b, if it is to be included at all, should apply only to specified enumerated activities that the city has a compelling justification to regulate which are spelled out in detail so that religious institutions can clearly understand what may trigger a compliance requirement. Preparation of that list will not be easy, suggesting that the best solution is to do away with clause b altogether.

***The 1000 square foot limitation contained in clause b.** If clause b is to remain in any form, this square footage limit needs both to be clarified and reconsidered. Does the limit apply on a building by building basis or on a room by room basis within a building? The answer makes a huge difference. While for many purposes a 1000 square foot per room limit might be adequate, it would impose significant restrictions on larger religious institutions such as our Church. We have a large structure with many large spaces, including a full-size gymnasium, that are needed by some of our social programs. We have smaller rooms that could be used, but that would limit both the number and size of programs that could be offered. In short, the proposal has the effect of discriminating against institutions having larger structures. It is those institutions that, like ours, have, of necessity, areas for parking and other support facilities that allow larger activities without adverse impact on the surrounding neighborhood. We do not have a suggestion for any alternative space measurement and suggest that it be dropped.

***The Conditional Use Permit requirement.** The Conditional Use Permit process should not be used to deny religious institutions that are permitted to offer worship services the right to offer social services in the same facility, since both are recognized protected religious activities. The application of general standards for issuance of Conditional Use Permits contained in Section 61.501, particularly (b), (c) and (d), to limit faith based social service facilities within a permitted religious institution facility runs the risk of violating RLUIPA or, at the very least, invites challenges under that Act. It is hard to imagine how stricter standards can be applied to social service programs within a religious institution than are applied to worship services in that facility, so forcing religious institutions to go through the Conditional Use Permit process where a permit will need to be granted is pointless. That argues for doing away with the Conditional Use Permit approach in this context altogether.

If the Conditional Use Permit requirement is to remain at all, it too needs further clarification. Could an application be made on a one-time basis for a permit which would allow the religious institution to conduct multiple “social and community services” or would a new application be required for each service utilizing a regulated space? The St. Paul ordinance dealing with Conditional Use Permits does not fit well with the kind of multiple activities contemplated by the Amendment and may be construed to require a new application for any new

social program as well any program that is discontinued for a year. Any system that requires multiple applications for multiple services would, in our opinion, constitute an unduly burdensome requirement on the provision of social services by a religious institution.

***Are existing social service uses grandfathered in?** We have heard comments that religious institutions do not need to worry about existing social service programs since they will be “grandfathered in” and not subject to the Amendment. Section 62.102 of the city code dealing with legal nonconforming uses and structures suggests that is not necessarily the case unless social services provided within a religious facility can be demonstrated to have been offered for a lengthy period of time, perhaps as far back as 1956. Our Church could probably meet that standard since no new facilities have been added since that date, but only if the general offering of social services and not particular programs is considered. Other religious institutions may not be so fortunate. If it is the intent of the Amendment to grandfather in existing social service programs, it needs to explicitly say so.

In sum, we support the goal of bringing clarity to the matter of the offering of social services within religious institutions. We do not believe the Amendment as currently drafted achieves that goal. By shifting the approach of the Amendment to provide that all social services, including but not limited to those enumerated (a list that should be expanded to the extent possible to cover other services currently being provided) and doing away with the restrictive and unnecessary standards and conditions, the goal can be achieved.

Thank you for your consideration.

Respectfully submitted on behalf of The Episcopal Church of St. John the Evangelist by

C Robert Beattie

C. Robert Beattie

Counsel

Fox Rothschild LLP

Two22 Building

222 S. Ninth St., Suite 2000

Minneapolis, MN 55402-3338

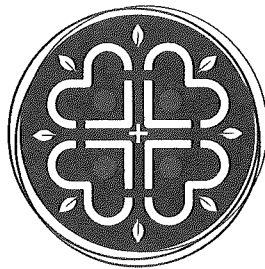
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ST. PAUL-REFORMATION LUTHERAN CHURCH
I N T H E C I T Y F O R G O O D

Rev. Dr. Patrick H. Shebeck
St. Paul-Reformation Lutheran Church
100 Oxford Street North
Saint Paul, MN 55104

21 October 2021

Dear Planning Commission,

I am writing to you in regard to the proposed "Religious Accessory Uses Zoning Study" that is under consideration by the Planning Commission on Friday, October 29. I write to urge you to reject this proposal and step away from future proposals that would – in any way – regulate the freedom of religious communities in the City of Saint Paul in any way.

The draft of the proposal that has been presented is extraordinarily ambiguous; there are unresolved questions regarding the freedom of new and emerging communities of faith, the definition of "social and community services" (proposed section 5b), and how and what powers the Planning Commission may have over the activities of religious institutions. These are only the beginning of the ambiguities that have the potential to limit the freedom of religious institutions. The only possible "next-step" for clarification, should conflict arise, is that such matters would be litigated in a court of law. A great many of the "accessory uses" that are proposed (1-5) are direct extensions of the faith convictions of religious communities. It is not up to the City to regulate these nor provide "permits" for them to proceed.

This is not, however, the central reason that this matter should be rejected. The central reason is that civil regulation of religion of *any kind* is a dangerous game. It will not end well. The impetus for this entire debacle is that First Lutheran Church won a lawsuit against the City of Saint Paul *precisely because* the City tried to regulate First's activities. Should additional restrictions/regulations pass (as proposed), they will simply bring

about future lawsuits that will be challenged in court almost certainly with the City (again) on the losing end.

Of further concern were discussed proposals to have a "religious advisor" to evaluate applications for Conditional Use Permits; this, too has the potential to cause enormously costly and lengthy litigation. Who is to decide what a faith community can and cannot do? What if there is implicit bias involved, or outright hostility towards differing faith communities on the part of such an "advisor?" Is this not, essentially, a government official regulating religious activities? *Et cetera...*

Likewise, in our conversation with Bill Dermody hosted by Interfaith Action of Saint Paul, it became clear that such "accessory use" regulation of houses of worship are not, routinely, enacted by other municipalities, and that such proposed regulation is the anomaly, not the norm. There is good reason for this: again, that religious institutions are exempt from regulation, even minimal regulation, as an expression of the free exercise of religion guaranteed by Article I.

Moving forward, I urge you to simply have a "hands-off" policy regarding religious institutions and their activities. This proposal is unnecessary. The *modus operandi* of the City should be to simply let religious institutions function as they will, neither regulating nor proposing regulation on them in any form whatsoever. It will be unwise to do otherwise, and I fear you do not realize the hornet's nest you will stir up should you proceed.

Pax,

A handwritten signature in black ink, appearing to read "P. Patrick Shebeck", with a long horizontal line extending to the right.

The Rev. Dr. Patrick H. Shebeck
Senior Pastor
St. Paul-Reformation Lutheran Church

Cc. Bishop Patricia Lull
Saint Paul Area Synod, ELCA

Sent: Wednesday, October 20, 2021 2:26 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Cc: #CI-StPaul_Ward3 <Ward3@ci.stpaul.mn.us>
Subject: Proposed Zoning Changes for Religious Organizations

Mr. Dermody,

I am contacting you because of my concern with proposed zoning changes in St Paul and the impact they will have on many religious organizations.

These organizations, through their religious affiliations and missions, work to support and uplift our communities and are important to the quality of life in our cities. While I read between the lines that the City seems to believe that these organizations might be using religious exemptions to avoid taxes, the proposed changes are like taking a hammer to a hangnail. I think that they are much too drastic and far reaching and will, in fact, discourage the very kinds of activities that we need in today's world to work on healing the many divides that we have.

I request that further input be gathered, and alternative solutions be investigated before enactment of any zoning changes for religious institutions.

Cathy Connett

2114 Bayard Avenue

Saint Paul, MN 55116

Sent: Wednesday, October 20, 2021 2:57 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Proposed change

Dear Bill,

I am opposed to the proposed change in building permits for religious organizations in St. Paul.

It is ironic that at such a time of high crime and unrest in this beautiful city there would be any restrictions on religious buildings and programming.

Thank you,

Jane Schmidt

Principal

Highland Catholic School

2017 Bohland Avenue

St. Paul, MN 55116

Sent: Wednesday, October 20, 2021 3:02 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>; Carla Collins <carla.collins1@yahoo.com>

Subject: Religious Accessory Uses Zoning Study - Zoning Code Amendments

Hello Bill.

I am a resident of the Highland Park neighborhood in St. Paul.

This zoning code amendment related to religious accessory uses is one of the worst ideas I've heard in a while.

There is no need for this change in the zoning code as it would adversely impact religious institutions in the area and for no greater good for the community that I can see.

Please accept this email as my written opinion that this is a terrible idea and should not be entertained.

Thank you. Carla Collins - 1068 Prior Ave S, St. Paul, MN 55116

Sent: Wednesday, October 20, 2021 3:23 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: Paul Feela <paulf@lumenchristicc.org>; 'Beth Maulik (bmaulik@outlook.com)'

<bmaulik@outlook.com>

Subject: Religious Accessory Uses Zoning Study

We understand that we have the right to express our feelings regarding the proposed changes to the religious accessory usage zoning. The section (A) and (B) listed below are extremely onerous and detrimental to the community development goals of any and all religious institutions. These rules essentially say you cannot grow your religious facility once it has started. Small churches, temples and mosques tend to start out small and bare bones. As they succeed, they need to grow. Growth needs facility expansion. Growth also is hampered by the need for conditional usage permits. Gathering to practice our religion consist of formal rites, but also mingling with like minded community participants. I strongly oppose inclusion of sections (a) and (b).

-

-(a) No building additions or new buildings may be constructed for the primary purpose of conducting a religious institution accessory use.

(b) In residential districts, a conditional use permit is required for social and community services with more than one thousand (1,000) square feet of floor area dedicated to those uses

Thank you

Roger and Elizabeth Maulik

1847 Highland Parkway

St. Paul MN 55116

Sent: Wednesday, October 20, 2021 3:41 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Zoning Ordinance

Dear Mr. Dermody and the Zoning Commission,

I am deeply saddened by the proposed *Religious Accessory Uses Zoning Study*. Not only does it obscure the intent of the original legal judgment that touched off these zoning law changes, but its motivation seems intent to restrict the work of religiously-based institutions and their missions. From a practical point of view, the work of churches, mosques, temples and other religiously-based non-profits contribute mightily to the stability of families, to addressing the needs of the poor and disadvantaged, to fostering of civic engagement among our citizens, and to facilitating the networking that upholds the social fabric of this city.

The freedom to worship and to educate in faith are not the only roles for our institutions. The role of religion is to engage in the public forum. From a religious stance we will know what action is ours to do, which words we are called to say, and how our spirituality must be fully embodied in our political choices.

Let me offer an example of the implications of this proposal in order to make my point: We encourage our congregation to be responsible citizens and vote. We also offer our facility to be used on Election Day for voting. Would we be required to obtain a City permit for this “accessory use” of our facility so that this can continue to happen? As proposed these changes to the zoning laws are not only ill-conceived practically, but unwise as a governance strategy, and quite possibly in violation of the religious freedom clause of the U.S. Constitution.

While separation of church and state is an important protection for all religions, it doesn’t mean we as people of faith should not engage in our civic duties, our social responsibilities, and the political process. These regulations, as proposed, would curtail much of what we can do as religious communities.

I urge the City Planning Commission to withdraw this proposal if, for no other reason, than the enormous benefits that religious institutions provide to the City.

Sincerely,

Fr. Paul Feela

Pastor

[Lumen Christi Catholic Community](#)

2055 Bohland Ave.

St. Paul, MN 55116

Sent: Wednesday, October 20, 2021 3:44 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Accessory Uses Comment

To whom it may concern,

I am a long-time resident of St. Paul, professor of theology at St. Catherine University, and current parish member at Lumen Christi Catholic Community in Highland Park. My three children also attend Highland Catholic School, the K-8 school associated with our parish.

I am writing to express concern about the proposed change to the zoning law in relation to the religious accessory uses. My first concern is a practical one. As I read the proposal, religious institutions would not get permits to build or renovate unless their renovations were directly impacting the worship space or kindergarten to 8th grade education. Most religious communities I know of have space that is dedicated to neither of these purposes. As a worst case scenario, I am imagining a refurbished chapel

next to a falling apart fellowship hall. It seems that this proposed change to the zoning law would put a barrier in the way of religious communities doing proper upkeep on their buildings.

My second concern is about the identity of religious communities and the way that this zoning law restricts this. Religious communities are so much more than a place to worship and educate. In a highly fractious time, faith communities may be one of the few places where people from both sides of the political spectrum gather to have coffee together. They are also one of the few places in which children, teenagers, adults, and the elderly may find themselves in conversation and cooperation. Even more importantly, most religious communities do not identify their mission as only inwardly-focused, that is, serving only those who walk in the doors for some form of worship. Any religious community worth its salt includes attending to the needs of the surrounding community. And attending to the needs of the surrounding community in effective ways means being nimble and being able to use the gift of their space in whatever ways they and the larger community deem appropriate.

This change in zoning law will directly impede the ability of religious communities to build up the broader communities in which they are located and to respond to the needs of the most vulnerable among us. It needlessly restricts the important and wide-ranging ministries of religious communities. I strongly and wholeheartedly encourage you to make changes to the proposal.

Sincerely,

Claire Bischoff

2030 Highland Parkway

Saint Paul, MN 55116

Sent: Wednesday, October 20, 2021 5:15 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Accessory Uses - Against proposed changes

Mr. Dermody - I would like to express my concern and say that I am against this possible change to the zoning code. If changed you make it very difficult and cumbersome for religious groups to help people that are in need or those within the community.

I find it odd that the media and the city keep talking about how we need to get out of our shells and do more to help the local community and yet the city pushes changes and laws that would hamper those that are at the forefront of trying to do good.

I ask you to not institute these changes but rather let all religious organizations continue to do the good work they have started.

Sincerely,

Becky Galioto

1932 Field Ave, St Paul, MN 55116

Sent: Wednesday, October 20, 2021 2:02 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Zoning Proposed Changes

Mr. Dermody-

I would like to express my concern for the upcoming changes to church zoning. I've lived in St Paul for over 30 years and have paid taxes on our home for that long too. My church community is an integral part of my life. From flu shots to socially conscious lectures to chair aerobics.

I do NOT support this change.

We sent our children to the catholic school and utilized before and after school program/daycare so that we could both work.....so we could continue to pay our ever increasing local taxes. The parish and school need to keep up with the times (both religious and societal) and any changes to facilities need to be easy.

To reiterate I Do Not support these changes.

Deborah Miller Slipek
1861 beechwood ave.
St. Paul MN 55116

Sent: Wednesday, October 20, 2021 4:08 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: OPPOSED - Proposed change in the zoning law

Bill,

I wanted to write you to express my **concern / objection** to the **proposed zoning law change** – and specifically as it would relate to religious institutions.

There is and *should be* separation of church and state in our country.

Your regulations are not needed and should not apply to religious institutions. Please note my objection.

Ethan Bischoff

Near Highland Parkway & Ford Parkway

Sent: Wednesday, October 20, 2021 3:06 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: zoning proposal

Mr. Dermody,

I want to write and express my displeasure at the proposed changes in zoning laws. As I understand it, it is being proposed that the city no longer grant or authorize permits to religious institutions that want to build or renovate their facilities unless these renovations were directly impacting the worship space or Kindergarten-8th grade education.

It is ridiculous to think that our parish will not receive permits for things such as adding more meeting rooms to our building, enhancing our Gathering Area, adding more pre-school classrooms or any number of other improvements. Secondly, it is important to us to build up the community and be of service to the wider neighborhood. Under these changes, we would be required to get an Activities Permit for every unrelated activity. Both of these proposed changes would restrict our parish and school ministries.

Thank you,

Katherine
1724 Hampshire Ave

Sent: Wednesday, October 20, 2021 3:20 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Zoning Changes for Religious Institutions in Saint Paul

Hi Bill,

I was shocked to hear about the potential zoning changes for religious institutions in Saint Paul. Churches and places of worship do much for our communities and putting up road blocks to them best serving their community is just flat out not right.

We have to deal with enough of this red tape as individuals, but our schools and churches should not have to endure the same.

I hope you reconsider this proposal.

Noah Namowicz
near Armstrong & Chatsworth

Sent: Wednesday, October 20, 2021 1:39 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Concerned about zoning changes that infringe on religious freedom

Dear Mr. Dermody,

I am wholly against the proposed changes. They underscore a lack of understanding about religious institutions and their mandate to create a community of believers not only in education and formal worship services but in social and cultural activities relevant to each parish, temple, mosque, etc. Seeking permits for allegedly non religious activities such as senior exercise or bingo is a heavy handed effort to define what a religious community can and cannot do to the benefit of the mental, emotional, physical, and, yes, spiritual health of its congregation. My point applies to the the proposal to restrict construction.

As Catholic Christians, we follow Jesus's command to love our neighbors by trying to fulfill the corporal and spiritual works of mercy. These are not limited to attending services and education. My parish, Lumen Christi, is MY community. It is where I and others worship and where I and others engage in activities that reinforce our God-given human dignity. Other religious institutions, whatever their denomination, fulfill the same human needs.

The proposed changes, if enacted, will certainly result in religious freedom lawsuits. Of that, you can be assured. The proposal is ill considered, innocent of knowledge of religious activities and religious freedom, and, in my opinion, in violation of the US Constitution.

The proposal needs to be withdrawn.
Thank you!

Sincerely,

Anne Klejment, PhD
Professor Emeritus of History
and the History of the US Catholic Church
Member, Lumen Christi Parish

P.S.

I live on Stanford Ave between Cleveland and Kenneth.

Nativity and Pilgrim Lutheran are in my neighborhood and I have voted in both locations as well as attended art exhibits at Pilgrim.

City Life is nearby too and at least in the past predecessor churches have used some of their space for childcare, which, of course, is a most desirable service.

I wish, too, to draw attention to the possibility that newer immigrant groups find their places of worship as social and educational centers as well while they adjust to their new circumstances.

Sincerely,

Anne Klejment

Sent: Thursday, October 21, 2021 2:08 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Fwd: Upcoming: Zoning Proposal

Hello Mr. Dermody,

I am a parishioner of Holy Spirit Catholic Church in St. Paul.

I do NOT support this proposed change in the zoning law. Why would you single out religious institutions in St. Paul?

I strongly encourage you NOT to support this change.

What if Holy Spirit wants to add on to its preschool? You would prohibit that? Why? That doesn't make any sense. If a Catholic school has students, and the school is growing then they deserve to expand, IF they think it necessary.

Do not stand in the way of religious institutions and their potential progress.

Thank you,

Kerry K. Moran

476 Nature View Ct.

West St. Paul, MN 55118

Sent: Thursday, October 21, 2021 1:57 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

Hello Bill -

I am reaching out to express my concern of this zoning change. This would greatly negatively effect our parish, school and community, especially consider all that is being done with the Highland Bridge projects. I strongly urge this change to not happen for the good of our community.

Thank you,

Moraghan DeRosia
Pinehurst & Davern

Sent: Thursday, October 21, 2021 11:25 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning Changes for Churches

Dear Mr. Dermody,

As an active member of the Lumen Christi Catholic Community in Highland Park, I respectfully ask that you deny and oppose the currently proposed zoning changes in St. Paul. These changes would have a tremendous impact on our ability to support the mission of the church and the calling that we are trying to live out based on our roles as disciples of Christ.

From our ministry and outreach committees, to our preschool and community support programs, this rezoning would negatively impact our ability to carry out our mission.

https://content.govdelivery.com/attachments/STPAUL/2021/09/17/file_attachments/1938931/Religious%20Accessory%20Uses-PC%20PH%2010.29.21.pdf

Thank you for your consideration.

Joe Peterson

1899 Highland Parkway

Sent: Thursday, October 21, 2021 3:18 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning Code- Religious Accessory Uses

Hello Bill,

My name is Kimberly Hanson. I live at 577 Annapolis St E, St Paul, MN 55118.

I am concerned about the limitations the proposed changes place on parish life, particularly in the ability to fulfill duties of ministering to the needs of our community. I am also concerned about the lack of future permits for building and renovating space that will be used for activities like preschool, end of life counseling, and group meetings that aid in spiritual well-being.

I ask and urge you and the Planning Commission to deny the proposed changes.

Please.

Kim

Sent: Thursday, October 21, 2021 2:16 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Proposed zoning change

Bill Dermody,

We have lived in St Paul our entire lives. We are members of Lumen Christi Catholic Community. Our Grandchildren attend Highland Catholic School. I retired after more than 30 years as an assistant city attorney for the City of St Paul.

We strenuously oppose the proposed change to the Zoning Code that seeks to regulate religious accessory uses. As written, the changes would prohibit certain improvements to the facilities, regulate community activities and adversely impact our parish and school ministries. We find no justifiable reason to adopt the change.

Please forward our objection to the Zoning Commission.

Thank you,
Frank & Mary Jo Villaume
671 Josephine Place, St Paul 55116

Sent: Wednesday, October 20, 2021 3:36 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Use Ammendment

Please say no to the Religious Accessory Use Ammendment.

Thank you,
Claire Crowe

878 kenneth street

St. Paul mn 55116

Date: October 21, 2021 at 5:39:56 PM CDT

To: bill.dermody@ci.stpaul.mn

Subject: Taking away the opportunity for religious institutions to upgrade their facilities to enhance and educate their constituents????

What is this????? I have been a LIFE LONG Highland Park resident and St. Leo's, Lumen Christi, Highland Catholic member, alumnus, and supporter since I was born up the block on Bohland - Will just mention it again—I have been a life-long parishioner and attended St. Leo's school and my children attended Highland Catholic and Cretin Derham Hall - I and my whole extended family attended Derham Hall and Cretin High Schools.

I am strongly opposed the city deciding ANYTHING to do with making decisions for these institutions - the thought of it is nothing short of socialism and communism.

I live on Highland Parkway; a stone's throw from where I grew up on Bohland Avenue - (again—up the block from Lumen Christi and Hi-C). I am 35 year veteran realtor selling in this neighborhood and defending this community. I am a top producer for Coldwell Banker literally about across the street.

If you have any questions please contact me.

This simply cannot even be considered.

Sincerely,

Lolly McNeely Salmen, CRS, GRI

Coldwell Banker Realty

1991 Ford Pkwy

St. Paul, MN 55116

Sent: Thursday, October 21, 2021 8:18 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious institutions zoning changes

Hi Bill,

We have recently been informed of changes to zoning laws for religious institutions. This is so deeply saddening to me and my family. Religious institutions are such an integral part of people's lives who choose to participate in them. They have already faced less membership in the last 20 years and this change could be a tipping point for

some to go under and not be able to provide for their members anymore. In a time of increasing mental health concerns, these religious institutions are so critical to keeping some people connected to a community and mentally stable. To make institutions jump extra hurdles to allow for support groups, exercise and yoga groups, social events and other community happenings for all phases of life is very short-sighted and edging on greedy of the city.

Please deeply reconsider this proposal.

Thank you,

Natalie and Robert Jones

1759 Yorkshire Ave. Saint Paul

Sent: Thursday, October 21, 2021 3:57 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning Proposal

Bill,

I am writing as a parent and St Paul resident, on behalf of Holy Spirit Church and School and the greater religious institutions within the city regarding the Zoning proposal that is in discussion. These proposals not only will impact our parish and school but the entire community of mosques, synagogues, or other Christian churches in the area.

I am encouraging the zoning department to rethink this proposal for a couple of reasons:

1. If we or any other religious institution wanted to add more meeting rooms to their buildings, add more classrooms (ie, preschool), or made any number of other improvements, a permit would not be granted.
2. Also it would require religious institutions to obtain a permit to offer any other programming which is not directly related to religious formation. Thus, any group not directly associated with Holy Spirit that uses our facility for social events or any form of activity that might build up the community or be of service to the wider neighborhood, would require an Activities Permit for every unrelated activity. (this is additional money we just dont have and I would suspect, not many others would either)

Both of these proposed changes would restrict our parish, others and school ministries immensely. Our parish is already tight for space and these proposals would limit our parish's ability to grow.

Thank you in advance for your willingness to listen and hear our communities. I hope you take this all into consideration as you proceed with proposals such as these and reconsider to not move forward with them.

Sincerely,

Katie Launderville

2153 Goodrich Ave, St Paul, MN 55105

Sent: Thursday, October 21, 2021 3:06 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Opposed Proposed Change in Zoning

Think Before You Click: This email originated outside our organization.

Mr. Dermody,

I am writing to oppose the proposed change in zoning that would negatively impact religious institutions and schools. I oppose the proposed zoning for the following reasons and encourage you to reconsider making these changes. We have children who attend Holy Spirit Catholic School and Cretin-Derham Hall and do not want these religious schools to be restricted in their ability to operate and grow.

The proposed change would have two major effects impacting all religious institutions:

1. The first change proposes that the city no longer grant or authorize permits to religious institutions that want to build or renovate their facilities unless these renovations were directly impacting the worship space or Kindergarten-8th grade education. That suggests that if a religious school wanted to add more meeting rooms to their building, add more preschool classrooms, or made any number of other improvements, a permit would not be granted. This is unnecessarily restrictive in nature. What is the purpose?
2. This proposal would also require religious institutions to obtain a permit to offer any other programming which is not directly related to religious formation. Thus, any group not directly associated with the institution that uses a facility for social events or any form of activity that might build up the community or be of service to the wider neighborhood, would require us to get an Activities Permit for every unrelated activity. I am not sure the purpose behind this. This restricts community building. It also takes additional time and resources that school and religious institutions do not have and cannot afford.

Both of these proposed changes would restrict our parish and school ministries. I oppose these proposed changes.

--

Best,

Amy Johnson-Grass ND, LN, LM, CPM

My home address is:

1125 Hague Avenue

St. Paul, MN 55104

I am also a business owner on Grand Avenue.

Owner + CEO

Health Foundations Birth Center + Women's Health Clinic

St. Paul + Minneapolis

www.health-foundations.com

P: 651.895.2520

F: 651.330.3768

Immediate Past President

American Association of Birth Centers

Radio Host on myTalk 107.1

The Health + Wealth Show

Sundays 10am-11am

Sent: Friday, October 22, 2021 9:55 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Change in Zoning Law

Mr. Dermody,

I am writing to express concern about the proposed change in zoning law that is coming before the Zoning Commission next Friday. I believe this proposal will adversely effect the many religious organizations in St. Paul. Religious institutions and their various ministries positively impact this

community. Restrictions such as those proposed impact their ability to build up the community or be of service during a time when these are sorely needed. I am hoping this proposal can be modified. Thank you for your consideration.

Dr. Mary Adrian
260 Cecelia Place
St. Paul, MN 55105

Sent: Friday, October 22, 2021 10:34 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Opposition to Proposed Religious Institution Accessory Uses Code Amendments

Dear Mr. Dermody,

I am writing to oppose the "**Proposed Religious Institution Accessory Uses Code Amendments**" to ARTICLE VII. 65.900 of the Zoning Code.

This is an infringement of the basic right to freedom of religion which I am quite sure, if passed, will not stand up in court. Its underlying error is a very narrow, incorrect definition of the function of religion limiting it to worship and childhood education.

It is clear in Sacred Scripture, in both the Hebrew and Christian scriptures, that the test of true worship is the faithful care of the widow, the orphan and the sojourner. In Matthew Chapter 25 Jesus makes care for the marginalized a litmus test for his followers.

In Acts of Apostles, Chapter 2, the model for the church is described with four elements: a COMMUNITY which WORSHIPS, EDUCATES, and CARES for others by sharing with others from its resources.

Government can not re-define what a church or synagogue is, or what its mission is, limiting it simply to worship and education of children. Nor can it decide what activities a congregation might hold essential to its community life.

If the problem the Zoning Commission is attempting to solve relates to Listening House and similar religious services to the poor, there are other administrative, less invasive ways of dealing with this problem, including the adding of resources and the enforcement of existing laws.

This rezoning is a clear government over-reach for a simplistic solution which will, in turn, cause multiple additional problems, and will be need to be challenged in court.

Sincerely,

Gene A. Scapanski, S.T.D.

2147 Sargent Avenue

Saint Paul, MN 55105-1128



⋮ All for the Common Good®

Sent: Friday, October 22, 2021 11:03 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning changes for religious institutions

Hi Bill,

I am a parishioner at Holy Spirit Catholic Church in St. Paul. I was recently made aware that there are some proposed zoning changes to religious institutions in St. Paul.

I understand that there is an online meeting to discuss this next Friday. While I will not be able to attend that, I just wanted to share my opinion that I think the proposed zoning changes would have an adverse effect on our Church. Therefore, I am against the changes.

Thank you for your time.

Sincerely,

Chris Murray

1064 Goodrich Ave.

St. Paul

Sent: Friday, October 22, 2021 3:58 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Cc: Goodman, Nicolle (CI-StPaul) <Nicolle.Goodman@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study - a citizen's thought

Mr. Dermody and Ms. Goodman:

I read the recommendations required by the City mandated by the US District Court to study as part of the 2019 settlement with First Lutheran church's Listening house. The recommendations by your department headed by Ms. Nicolle Goodman overstep the specific needs demanded by the US District Court and the recommendations of these newly proposed permits "clearly limit", and abridge the Constitution's First Amendment protection "prohibiting the free exercise thereof;". I cannot imagine why the City of St. Paul's Department of Economic Planning and Urban Development would make

recommendations to limit it's citizens and our fundamental right to worship and the free exercise of our faith.

In fact – in the 30+ years I have lived in St. Paul I can attest that most of the advancements I have seen in our economic development and social development have come directly from faith communities that have added worship, education, social meetings, sports, food drives, outreach for the less fortunate, financial support for those seeking work, homes and programs that deal with addiction all without oversight or direction from the State/City. I have been impressed by faith communities that live out their responsibilities to fellow citizens be they Jewish, Protestant, Catholic or other. These improvements are self-funded, require no government funds and greatly improve the quality of our life in St. Paul. They are one of the reason's I consider St. Paul my home and I am proud of my fellow citizens dedication to improving our community.

I cannot think of any programming of or by the City and it's Dept of Planning and Economic Development that has had any measurable improvements over the same period impacting so many of my fellow citizens. I am confident that the Department would do well to join with private organizations and citizens to improve the city rather than arbitrarily trying to limit it.

Lastly, it is fundamentally clear that these permits by a local city council are contrary to the United States Constitution and our most central and cherished right to worship. The targeting of religious institution and citizens exercising our right to worship is a specific form of tyranny and against the law. We will not allow it.

Proposed violations of the Constitution, Tyranny, Bureaucracy and Ineptitude are never great ideas to propose to free citizens of our great city. I certainly expect you to reconsider these overreaching regulations and join with faith communities to work together to improve our community.

Sincerely;

Tim Murphy

1911 Bohland Avenue

St. Paul, MN 55116

Sent: Thursday, October 21, 2021 3:13 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Zoning Change

Dear Bill,

I strongly urge you to oppose the religious zoning change. Religious organizations need to be able to make needed additions or improvements. Also, requiring an activities permit for any outside groups that want to use religious facilities does not make sense. Don't make it harder for groups that want to better the community.

Thanks, Michael Young, St Paul resident, Schaffer and Wheeler. 55116

Sent: Friday, October 22, 2021 2:33 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious zoning

Please do not limit or restrict what religious based schools and institutions can build. It is not the job of local or federal government to restrict religion or our personal freedoms to finance its growth. I fail to see how this benefits society as a whole. If anything we need more spirituality and availability of community resources to learn and promote values that benefit our whole country. It's not happening in public schools that's for sure. So we choose to pay our kids schooling in a relationship based environment. Why would we not allow AA, Alanon, Girl Scouts or other community based services use these buildings? Why would we want them to get permits for these meetings?

Really, this activity makes it seem like our communities are afraid of human interactions in the form of religious and non religious gatherings.

Just make sure buildings are safe and safely built. That is the job of permitting. Not making it difficult for certain groups to get permits.

Thanks for listening - if you did.

Christine Guyott, FCSI, RD
Cross streets: Annapolis and Delaware

Sent: Friday, October 22, 2021 2:11 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: zoning changes

I was disheartened to read about the possibility of changing the zoning regulations when it comes to houses of worship/school. Given the many issues we have to deal with in our city, this effort is the least of our worries. What is the point? What this would impact is the ability to create communities and enhance better relations with our neighbors. Instead of penalizing religious groups, why not put your energies into solving the divisive rhetoric about housing, police,homeless,etc. The list goes on. Please do not push this zoning issue.

I belong to Holy Spirit Parish at Randolph and Albert. I live on Chelmsford St. in St. Anthony Park. Please take to heart my thoughts. Thank You.

Deb Townley

Sent: Friday, October 22, 2021 4:38 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: change in the zoning law

I have been alerted to a potential change in zoning laws that affect churches in St Paul., I can not see how this change to the zoning laws will improve anything for the residents of the city.

As such, I oppose this change. Churches are a fundamental component of a neighborhood and quality of life in the city. Limiting the size of a church's buildings will limit the services that can be provided by the church to the community. Since government is unwilling or unable to provide some of these services, the church have taken over essential social functions of our community. I am not sure why we want to limit this.

sincerely,

Mary Beth Blomgren

resident of Highland Park in St Paul

Sent: Friday, October 22, 2021 5:07 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: bryanne.horn@gmail.com

Subject: Zoning proposal changes to religious institutions

Hi Bill,

I am reaching out as a St. Paul community member about the proposed zoning changes that are to be discussed at the next meeting Friday 10/29 regarding religious institutions. I am a member of Trinity City Church in Merriam Park and also have children who attend Holy Spirit school in Highland Park. I strongly oppose the proposed changes that would restrict any religious institution's ability to add on to their space or to require permits for nonreligious activities in these facilities. Please reconsider as these proposed changes will most definitely have a significant impact on all of St. Paul's religious institutions independence and ability to serve our community well.

Bryanne Horn

1743 Montreal Ave

St. Paul, MN

Sent: Friday, October 22, 2021 6:29 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning Proposal that impacts churches

Hello Mr. Dermody.

I am writing to urge you not to revise ARTICLE VII. 65.900. ACCESSORY USES as currently proposed.

The proposed revision needlessly interferes with the ability of churches and other community organizations to adapt their properties to better meet their needs. This change seems to be both an excessive interference by the government into the operations of religious communities. It also doesn't seem to address any pressing need or problem.

Therefore, I hope you will table this proposed change for now and have a more wide-ranging discussion about the issues that are motivating the change with the people in the community that will be impacted by it.

Thank you for your consideration.

Tom Modl

310 Hamline Ave. S

Saint Paul, MN 55105

Sent: Sunday, October 24, 2021 3:16 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning law

I don't quite understand the motive behind this but it does seem to target Christians in particular. There seems to be no logical or positive benefit to such a law for the community.

I would be very much opposed to such a move.

Thank you for your attention to this matter.

Blessings,

Pastor Joe Marsh

--

Calvary Evangelical Lutheran Church

341 Hamline Ave. S.

Saint Paul, MN 55105

Sent: Sunday, October 24, 2021 7:07 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed zoning law change

To whom it may concern:

I am a St. Paul homeowner, taxpayer and registered voter. I strongly object to proposed zoning law changes for building and/or renovating property owned by St. Paul churches for religious accessory. Such changes would restrict religious freedom and are therefore unconstitutional.

Thank you.

Karen E. Bauer

1181 Edgcumbe Rd. #709

St. Paul, MN 55105-2834

Sent: Sunday, October 24, 2021 7:48 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning Law Proposed Changes

I am a parishioner of Lumen Christi Catholic Community, and I'm writing to object to the proposed changes requiring permits for services to our community which you think may not be directly related to religious formation. The proposed changes would restrict our parish and school ministries from providing needed community and social interaction and support for seniors, youth and our larger neighborhood community. Please re-think this. Thank you.

Linda Crosby

1941 Ford Pkwy. #102

St. Paul, MN. 55116

Sent: Monday, October 25, 2021 7:36 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning Change

Hi Bill - I do not support the proposed religious accessory uses zoning changes.

Paul Carruth

Great Lakes Millwork

1935 Bayard Ave

St Paul MN 55116

Sent: Wednesday, October 20, 2021 3:19 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning Changes

I have just been made aware of some zoning changes which might adversely affect my parish. I read the document the city put out, but I don't understand the problem that the proposed changes are made to solve. Is there a problem with a church adding to its lobby or hosting a bridge group? These activities would seem to be curtailed under this proposed policy. So I oppose the changes unless there is some valid reason for making them.

Bob Hartzler
1590 Beechwood Ave, 55116
Lumen Christi Catholic Community

Sent: Sunday, October 24, 2021 5:58 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Cc: MaryFrances Schurb <mfschurb@outlook.com>
Subject: Strong Concern re: Religious Accessory Uses Zoning Study

Mr. Dermody,

As a citizen of St. Paul and an active member of my local Catholic Parish – I'm extremely concerned and strongly disagree with the potential of further overreaching restrictions placed on my place of worship as outlined in the [Religious Accessory Uses Zoning Study](#).

It is extremely upsetting that my city is considering such onerous and far-reaching restrictions which would prohibit my faith community from making renovations to our facility. Our community works hard to create a warm and welcoming environment for all members and guests. The fact that you would propose no longer granting permits to make improvements to our gathering space and meeting rooms is not acceptable. We use these spaces to build and support our community. Building community is an essential component of our faith and is more than just Sunday worship services. Meeting rooms are used throughout the week and a necessary part of engaging members in the running of our parish.

Further, requiring a permit for simply gathering together to support each other through daily life and simple activities such as bridge groups, senior exercise classes, lunches/meals and other means of social and community outreach is another example of incredible overreach on the part of the city. This appears that you are attempting to prohibit us from gathering or at the very least make it virtually impossible. This is not acceptable and makes me afraid of what kind further overreaching the city is contemplating.

I strongly urge you to reconsider these changes. They represent an attempt to limit my faith community's growth and vitality.

Sincerely,

MaryFrances Schurb
2083 Watson
Saint Paul, MN 55116

Sent: Sunday, October 24, 2021 3:03 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses

Dear Mr. Dermody,

I am writing to share my opposition to the proposed changes before the planning committee regarding religious accessory uses. These proposed changes would have a profound impact on the ability of religious organizations to live the service aspects of their missions in meeting many of the needs of the community going unmet by local and state agencies in Minnesota. Moreover, the introduction of the activities permit seems places an unwarranted financial burden on the financial operations as many, if not all organizations contend with the continued impacts of the pandemic.

Thank you for your consideration of my perspective.

John Pyle

Cross streets: Portland and Cleveland

Sent: Monday, October 25, 2021 9:28 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Comments, Religious Accessory Uses

Dear Mr. Dermody,

As a resident of St. Paul (2189 Buford Avenue) and as the author of the attached op ed piece in the October 17th Star Tribune, I strongly oppose the recommendation in the proposed religious accessory uses zoning code amendment that prohibits new buildings or additions on religious property in order to accommodate accessory uses. That part of the amendment is an excellent example of the public sector infringing upon the religious freedom of faith organizations to pursue their mission and it is, in my opinion, a clear violation of the Religious Land Use and Institutionalized Persons Act.

The city has the right to require that accessory uses be in structures that meet the health and safety requirements of the state building code and it can require that new buildings and additions meet setback or height requirements, for example. But to forbid the construction of a new building or addition to accommodate an accessory use goes far beyond any reasonable effort on the part of the government to ensure public health and safety. What if the church needs more space and also has accessory uses as part of its activities? Are you forbidding the church from ever expanding its footprint?

This oversteps the important separation of church and state to such an extent that I am sure it will be challenged in court. Have you not learned from your required training in RLUIPA?

With frustration from a tax-paying resident of St. Paul,

Tom Fisher

Sent: Monday, October 25, 2021 9:40 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Accessory Uses Zoning Study

Dear Mr. Dermody,

My name is Matt Brady and I attend church at Calvary Chapel St Paul in St Paul, MN. I have recently learned about the proposed zoning changes to Chapter 65 that impact religious organizations, for which there is a meeting on Friday, October 29. I would like to respectfully voice my disapproval of this proposed change and I plead with the City of St Paul to not do this. I am not able to attend the meeting on October 29 and I would like to voice my concern here.

It is my belief that this proposed change would put an onerous burden on churches: both to seek and obtain an Activities Permit for every non-worship related activity that churches facilitate, along with prohibiting churches from upgrading and remodeling non-worship areas within a church. Churches are communities of people with a First Amendment right to freely associate and to freely worship. I do not believe churches should be made to seek permits in order to have a youth group, an exercise class for seniors, or a non-religious class for children or adults. If a church wants to remodel their entryway, I believe they should be treated as any other institution which would have the legal right to do this (like a restaurant or a store). Lastly, many churches are small and they do not have paid staff or sufficient volunteer labor to handle managing all of the permits that this would require. It would onerously hurt smaller churches.

I humbly and respectfully ask the City of St Paul to not go through with this proposed rule change because it would have a negative and immediate impact on myself, my church, my fellow believers (of any religion) and the city my church calls home, St Paul.

All the best,

Matthew Brady

6702 7th St N

Oakdale, MN 55128

Sent: Monday, October 25, 2021 11:03 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

Dear Bill,

The proposed changes to the zoning law would greatly limit our parish's ability to grow, especially in light of "The Bridge" expansion on Ford Parkway.

We are already tight for space here at the school and church. If we want to add more meeting rooms, enhance the church's gathering area, or add more preschool classrooms, we should be able to do so.

Also, requiring an Activities permit for every single church social event or form of activity that might build up the community or be of service to the wider neighborhood seems like overreach.

These proposed changes would greatly restrict our parish and school ministries.

Please do not allow this City Proposal/change in the zoning law to go forward.

Maureen Barth
Highland Catholic School
2017 Bohland Ave
Church of Lumen Christi

Sent: Monday, October 25, 2021 11:48 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

Dear Mr. Dermody,

I am disturbed by the proposed change in the zoning law ("Religious Institution Accessory Uses Code Amendment") that is scheduled to come before the Zoning Commission this Friday, October 29.

As proposed, the changes would have adverse effects on all religious institutions in St. Paul, restricting parish and school ministries, and limiting their ability to grow. My husband and I have chosen to live in St. Paul and accept our urban property taxes in order to be close to our church and school; this proposed amendment is not only insulting, but it appears as though the city has sold its soul in exchange for some undefined gain.

The proposed amendment is clearly a case of government overreach which should not be approved.

Sincerely,

Kelly Bower
1130 Edgcumbe Road
St. Paul, MN 55105

Sent: Friday, October 22, 2021 1:50 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Proposed Religious Institution Accessory Uses Code Amendments

Good day Mr. Dermody:

I am writing you to express my concerns about the Religious Institution Activities Amendment. This change is ridiculously absurd!

1) Religious organizations would be unable to offer and perform outreach activities under these proposed changes. One of the fundamental duties of any Christian organization is to reach out to those in the community.

2) The changes would infringe upon the rights of people to support the activities of their churches. These rights are a freedom all of us have to worship.

I strongly urge the panel that is considering these changes to turn them down.

Thank you

Mike Moren

457 Emerson Ave W
West St. Paul, MN 55118

Sent: Monday, October 25, 2021 9:15 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious restrictions
Importance: High

Mr. Dermody,

I am writing today to express my concerns over the overreach of local government on religious institutions. I am learning of restrictions to churches in the St. Paul area (my hometown) that require permits to do good in the communities in which they serve. I am vaccinated, and encourage the vaccination of the overall public. I disagree with mandates, and I abhorrently disagree with the coercive captivity of religious institutions to continue the overall public service of good at the local, state, and federal levels. It is in our inherent nature as humans to serve others, and I feel government is obtrusively blocking this natural human right of good and righteousness in the public service of

humanity. I condemn your obstructive nature, and call on your service to humanity to privately (and publicly) cease and desist of this blatant disregard of human nature's desire to help their fellow man! Please behave yourself!

[Religious Accessory Uses Zoning Study - Lumen Christi Catholic Community - St. Paul, MN](#)
(lumenchristicc.org)

If your conscience desires a discussion, please feel free to contact me privately at 651-271-8159

Regards,

Russel Westman | Master Data Specialist
3M Transportation & Electronics Business Group, USAC Customer Operations
3M Center, 220-3W/F01 | St. Paul, MN 55144

Home cross streets: Princeton Ave and Prior Ave S.

Sent: Sunday, October 24, 2021 9:28 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Re: 10/29 Mtg

Hello:

Please Vote NO to this obstruction of Religious Freedom. As a Veteran USMC, I served to protect our Freedoms, especially for Religious Beliefs.

Thank you,

Ray Garcia
538 Saint Peter St
St. Paul, Mn 55102

Sent: Friday, October 22, 2021 4:06 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: zoning proposals

Good afternoon, Bill. As a congregant at a church in Miriam Park and as the father of two children who attend Holy Spirit school, I STRONGLY oppose the two proposals set to be discussed as part of the Zoning Commission meeting on 10/29. These changes would have a significant impact in our ability to grow and would hamper our ability to serve our pre-K students, among others. As the father of a pre-K student myself, I cannot emphasize enough the quality of education my daughter is receiving at Holy

Spirit and I am adamantly opposed to the city creating barriers towards making this quality of education (one we did NOT receive at an SPPS (Expo), mind you) accessible to others.

Second, I greatly oppose the city taking steps towards requiring a permit for non-religious activities from congregating on church property. One of the hallmarks of the Christina religion is outreach and engagement with the community. The city is, once again, threatening to impede this by way of unnecessary overreach. Please consider the ramifications of both proposals in your upcoming meeting as they will have significant impact on the lives of both the congregants of the religious institutions we belong to as well as those whom it strives to serve.

Will Horn

1743 Montreal Ave.

Sent: Friday, October 22, 2021 9:18 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: pfeela@lumenchristicc.org

Subject: new restrictions of churches in St. Paul

I find these proposed zoning changes to our faith formation services and churches an attack on our Christian faith. What is St. Paul hoping to gain? Administrative fees/taxes? Please vote against this move to restrict how we celebrate our faith and maintain our buildings.

Maureen Terry

1855 Montreal Ave., between Fairview and Howell.

Sent: Monday, October 25, 2021 9:30 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning Laws - Religious Accessory Uses

Good morning Mr. Dermody,

It's come to my attention that on Friday you'll be voting on a proposed Religious Accessory Zoning Law change and my prayer is that you'll do the right and legal thing and vote no to protect religious freedom in St. Paul.

Thank you,

Amanda Brady

6702 7th St N

Oakdale, MN 55128

I attend church in St. Paul at Princeton and Prior.

Sent: Sunday, October 24, 2021 11:44 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Saint Paul Zoning Proposal

Bill,

I am against the zoning proposals for religious institutions. The restrictions would have a dire impact on ministry and community outreach. No longer would we be able to host AA meetings, Food shelf programs, teen nights, Friendship Club for the developmentally disabled - among other important gatherings.

The city does not offer these services in every neighborhood - the city should welcome and support church efforts to reach out to those in need.

I am baffled by such restrictive proposals. Churches of all faiths are a heartbeat for the community and provide many services to a community.

It is especially difficult to hear about these proposals at a time in our history when division, isolation, and hatred has taken hold. We so desperately need the warmth and inclusion and outreach that only church communities can offer.

SHUT THE PROPOSALS DOWN.

This kind of government control will only lead to more hurt, division and isolation.

Sincerely,

Katie Mendenhall

Holy Spirit Church and School

located at the intersection of Albert and Randolph

Office address is: 515 S Albert Street St. Paul 55116

Sent: Monday, October 25, 2021 10:13 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed zoning change with adverse effects for religious institutions

Good morning, Mr. Dermody:

I am writing to express my major concern over the proposed zoning changes that would not allow a religious institution to obtain a permit for future construction or improvement. Please do not let this change occur as it would have many adverse effects on many of our outstanding religious institutions in the city that provide so much rich diversity, strong community building, and essential services (such as

daycare) to our city and surrounding community. This limitation would have lasting and prohibitive effects for so many institutions that are remarkable parts of our lives.

PLEASE DO NOT ALLOW this time change to be made.

Thank you,

Sara Cotter

1883 Warrior Dr, Mendota Heights, MN 55118

Sent: Thursday, October 21, 2021 2:11 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Zoning Law Change

Hello Mr. Dermody,

I can't express my concern regarding this proposal to be discussed on Friday, October 29th at 8:30 a.m.

One of the key elements of Christianity is to reach the needy; the poor; the widowed. In other word, reach those in need. I believe Christ had a reason for this mandate to Christians. I believe he truly felt the separate of church and state was important. Our state is so broke; that it desperately needs the community churches and their outreach programs. This state doesn't need to be taking on these extra tax burdens that this ordinance will create. Please don't stifle sources of income that play such a vital role in Christian lives; and relieves the tax burden for all.

Stop the madness.

Thank You,

Mary Anne Wolff

cross streets: Albert and Randolph

Sent: Monday, October 25, 2021 11:14 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: No to the proposal for a religious accessory uses zoning study law change

Bill,

My family and I are telling you No to the proposal for a religious accessory uses zoning study law change. On 10-29-2021 you are having a St Paul zoning commission meeting regarding this proposed zoning law change. This zoning law change will restrict religious freedom regarding not giving permits to religious institutions for construction renovations and for program activities. We live in a land where the

constitution claims that we have the freedom to worship. Reading this link explains the support of every St Paul religious institution to say No to this proposal since it will restrict religious freedom which is against the law.

<https://lumenchristicc.org/news/religious-accessory-uses-zoning-study>

Craig Stephens
1865 Bayard Avenue
St Paul MN 55116

Sent: Saturday, October 23, 2021 6:31 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject:

As a parishioner of Lumen Christi and St. Gregory for 40+ years I have to express my deep concern for any effort to restrict our parish's ability to use their property as they see fit. They should be allowed to make decisions on their own as are other property owners.

Another proposal that would affect our parish ministry involving activities permits. Our church offers programs for seniors, teens, and other church members. These meetings help build our community. There is no reason why an Activities Permit should be required for these events. It complicates efforts to help our parish grow.

Please consider how these actions would impact our church.

Sincerely,

Sharon and Tom Thieman

We currently live in Mendota Heights, MN. 581 Sibley Court. We continue to attend Lumen Christi and are very concerned about our long-term parish.

Sent: Thursday, October 21, 2021 5:39 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Accessory Uses Zoning Study

Dear Mr. Dermody;

Please know that I strongly oppose the proposed change to zoning as regards the city no longer granting or authorizing permits to religious institutions that want to build or renovate their facilities unless these renovations directly impact the worship space or Kindergarten-8th grade education.

This overreach of city regulation would restrict our parish and school from continuing its mission as a religious institution.

I **strongly** oppose this proposed change.

Sincerely,

Peggy Endres

Resident of Saint Paul

cross streets: Rome Avenue and Wilder Street South

Sent: Monday, October 25, 2021 11:49 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: 10/29 Saint Paul Zoning commission meeting

Mr. Dermody:

I am writing to ask you to say NO to the proposed zoning law change to religious accessory uses. This is an attempt to restrict religious freedom, which is already under attack in what was once a free nation. The Constitution needs to be respected in all manner, INCLUDING our freedom to worship, and gather with those like-minded. A big part of that freedom is community outreach to serve the needs of those around us in a manner that is MUCH more efficient and cost effective than government instituted programs.

This zoning law change could also subject you or anyone involved to contentious and expensive liability claims, as these type actions AGAINST organizations of faith are in violation of the Constitution.

Thank you for your time & consideration.

Sincerely,

Anita Hagstrom

19137 Everest Trl, Farmington, MN

Sent: Sunday, October 24, 2021 7:35 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious zone proposal

Dear Sir,

I just read the proposal to limit St Paul religious organizations regarding facilities for activities. My husband and I have taught in former communist countries in East Europe and Russia and are familiar with the suffering of Christians under communism. The restrictions in this proposal are the same as those imposed on churches under communism. Such restrictions led to more and more oppression and eventually to the

burning of churches and the execution of priests and ministers. I do not want to be alarmist, but the similarity is striking and makes me wonder what the motivation is for proposing such restrictions. The activities listed are among activities churches have done for many years, both inside the congregation and out in the community. Why should these activities now be limited? The need for such services is greater now than ever before. Where can I get information about the purpose of this proposed limitation?

Thank You,

Sandra Hall

cross streets: Macalester St and Jefferson Ave

Sent: Thursday, October 21, 2021 10:27 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning; Holy Spirit Church and School

I am outraged by these purposed zoning laws.. Our parish is already tight for space and these proposed changes would limit the parish's ability to grow. Our community does so much for others; I'm not sure why we should be punished.

Parishioner of Holy Spirit and proud parent of a Holy Spirit student.

Amy Rolfzen

cross streets: Highland Parkway and Albert

Sent: Friday, October 22, 2021 9:17 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Changes to Religious Accessory Uses Zoning

We would like to express my concern with the proposed changes to the Religious Accessory Uses Zoning. We are residents and business owners in St. Paul as well as members of Lumen Christi Catholic Community. Restricting our ability to change our parish space or preschool is ludicrous. But even more disturbing would be the requirement for a permit to do "non faith formation" gatherings. We often share our space with our neighbors and civic organizations--I vote at Lumen Christi and we have hosted meetings for the Highland District Council and with our state representatives. These are just a few examples of how we use our space--community engagement IS acting on our faith! This seems like a solution in search of a problem. St. Paul

has enough bad stuff going on with crime, horrible street maintenance and plowing, skyrocketing taxes, etc. Please leave the Religious organizations alone.

Thank you.

Robert and Anne Maley

1924 Hillcrest Ave. 55116

Sent: Thursday, October 21, 2021 3:41 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning laws

Change in zoning laws will have a deep impact on our church, Lumen Christi , and Highland Catholic School. We not only services the needs of our community but the far greater community . Please reconsider this.

Rita Dillon

1703 Hampshire Ave 55116

Sent: Friday, October 22, 2021 6:47 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Re: Religious Institution Accessory Uses Code Amendments

Bill Dermody,

I am writing to you in regards to the Religious Institution Accessory Uses Code Amendments. I am a resident and tax payer in the City of St. Paul and I am **NOT in favor** of these amendments. The changes you are proposing would make expanding our services and support to communities in need almost impossible to afford and execute. As an example, I am a Girl Scout Troop Leader. We utilize the spaces at the Church to hold our Troop meetings. Your new requirements would make it financially impossible for us to continue to provide this service to the girls of St. Paul. Also, your restrictions on improving and expanding much needed classroom and facility space for our education buildings to continue to meet the needs of our growing student population is disheartening. We are attempting to deliver the best school experience for our community as possible. Limiting our ability to make needed changes now and into the future is short sighted as the need for STEM programming, at a minimum, requires more space to execute.

I am asking you **do not approve** these amendments. The consequences would be detrimental to the continuation and expansion of services and education for our community.

Lynne Moser

cross streets: Edgcumbe and Montcalm Place

Sent: Sunday, October 24, 2021 6:27 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning

Dear Mr. Dermody;

Please know that I strongly oppose the proposed change to zoning as regards the city no longer granting or authorizing permits to religious institutions that want to build or renovate their facilities unless these renovations directly impact the worship space or Kindergarten-8th grade education.

This overreach of city regulation would restrict our parish and school from continuing its mission as a religious institution.

I **strongly** oppose this proposed change.

Sincerely,

Mary Schiltgen

1654 Eleanor Ave

St. Paul 55116

Sent: Monday, October 25, 2021 1:58 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Religious Institution Accessory Uses Code Amendments

Mr. Dermody,

I would like to speak out **AGAINST** this proposal that you will be reviewing.

I have read the proposed amendments and I **DO NOT** believe they are in the best interest of the religious institutions, or the city of Saint Paul as a whole.

Please confirm that you have received this email.

Thank you,

Patrick Hogan

Saint Paul Resident

cross streets: Cretin and Niles

Sent: Monday, October 25, 2021 1:26 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning changes

Dear Mr. Dermody;

Please know that I strongly oppose the proposed change to zoning as regards the city no longer granting or authorizing permits to religious institutions that want to build or renovate their facilities unless these renovations directly impact the worship space or Kindergarten-8th grade education.

This overreach of city regulation would restrict our parish and school from continuing its mission as a religious institution.

I **strongly** oppose this proposed change.

Nora Osendorf

535 Lexington Pkwy

#201

St Paul MN

Sent: Monday, October 25, 2021 2:08 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious institution accessory use

Bill,

I strongly object to the proposed zoning law changes for religious institution accessory use.

The items listed as accessory use have always been part of most religions activities.

This proposed changes are basically a direct attack on the practice of religious faiths.

This could be used to shut down any expansion of Dorothy Day, Catholic Charities, Lutheran Social Services and other faith based services, which we need more of, not less.

Therefore, I repeat, I strongly object to the proposed zoning law changes for religious institution

accessory use.

Thank you.

Bruce D Robinson
1181 Edgcumbe Road #310
Saint Paul, MN 55105-2833

Sent: Monday, October 25, 2021 2:28 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Re: Citizen concern with Religious Accessory Uses Zoning Study

Dear Bill,

My name is Heather Bach and I am a resident of Saint Paul (55116), parishioner of Lumen Christi Catholic Church and a parent of two children at Highland Catholic School.

Leaders of the church have shared details about the proposed change in the zoning law that will be coming before the Zoning Commission this week. I would like to express my concerns with this change. The positive impact both the church and school have on the local and extended community is immense and any limitations on how they can each evolve and grow to best meet community needs would certainly have negative consequences.

The ongoing challenges of Covid-19 are a prime example of the need for places of worship, education and support to be agile and flexible in how they can serve the community. Throughout 2020 my children were both able to safely attend in-person school (pre-school and 1st grade) because Highland Catholic was able to take on remodeled space at Lumen Christi for their preschool program to then create the extra space needed for classrooms in the K-8 building. Restrictions such as those proposed would have not allowed this fix to happen so quickly or at all, impacting both their education and my ability to work full-time, not to mention our overall connection to the community. It is critical for institutions like these to be able to respond and quickly adapt to evolving needs.

I am also particularly concerned with the limitation on any programming not directly related to religious formation. There are so few ways for especially older parishioners to come together as a community in a safe and uncomplicated way, and putting restrictions in place that would limit or complicate the planning of these activities really seems counterproductive for community building. There are enough hurdles in this world and having to require new permits everytime a Men's Club, Bridge Club or Quilt Club wants to gather really shouldn't be one of them (apologies for being so blunt!).

I am hopeful that the proposed changes are thoughtfully considered with a lens on community building and the need for institutions to grow and evolve in a way that best serves our neighborhoods.

Thank you for your time and I would be happy to speak further if helpful at (651) 272-7285.

Kind Regards,

Heather Bach

Sent: Monday, October 25, 2021 3:57 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

Dear Mr. Dermody,

I urge the City of St. Paul to not do anything to infringe on our religious freedoms. Our churches have stepped up and provided a number of services that state and local governments are unable to.

Our church at 1139 Payne provides numerous services to children, the homeless and those recovering from addictions. To do anything that may make providing these or future services more difficult would really be a lose/lose proposition.

Thank you.

Robb Jacobs

Rivertown Christian Ministries International
1139 Payne Ave. St. Paul, MN

Sent: Monday, October 25, 2021 5:10 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: zoning proposal

If the city no longer grants permits to religious institutions that want to build or renovate, it will limit the gathering of individuals at that religious institution.

If the city requires a permit for each activity which is not seen as worship, it will put up a cumbersome barrier to religious institutions which are a dependable means of positive community engagement that impacts elder care, family cohesiveness.

Since religious institutions have a history of community service it seems counterproductive for the community to put up barriers to connection and service with the fees and permits.

As a 40 year resident of St. Paul I oppose this measure.

Mary Jo Robinson-Jamison
270 Warwick Street
St. Paul, MN 55105

Sent: Monday, October 25, 2021 5:27 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning

Dear Mr. Dermody,

I have recently been made aware of the zoning plans that would disrupt religious institutions in the city of Saint Paul and impede our freedom of religion.

The new zoning amendment would not allow religious institutions to build or renovate our facilities unless the renovations directly impact worship space or Kindergarten through grade 8 education. The free practice of religion goes well beyond individual and group worship and teaching elementary school children. I believe that my religious responsibilities include care for the elderly, the widows and orphans, the sick, the dying, the homeless, children, and the unborn. To grow in fellowship, it is within the practice of our religion to meet in a variety of configurations, not merely to meet to worship in a church sanctuary. While my church has plenty of room to build, the new zoning plans would not allow us to build things that would allow care for the elderly, teens, or fellowship. In addition to not allowing us to obtain permits to build or renovate for purposes other than worship and school space, I understand that the new rules would also require us to seek permits for many of our ministries and things that we do to support our church—youth groups, men’s club, ministries for the elderly, etc. Additionally, we would have to obtain permits for fundraising activities that we have conducted for many years like craft sales, etc.

I believe that this new zoning rule is an attack on freedom of religion in the city of Saint Paul. I strongly oppose this rule.

Gailyn Ryan

1587 Jefferson Avenue

St. Paul, MN

Sent: Monday, October 25, 2021 9:10 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: #CI-StPaul_Ward3 <Ward3@ci.stpaul.mn.us>

Subject: Proposed Code Amendments

Bill,

I am writing to express my deep concern about the proposed Religious Institution Accessory Uses Code Amendments. If passed, the amendments would seriously interfere with my Church's ability to fulfill its core mission. Religious institutions provide incredible resources and social justice programs for the people of St. Paul, and it would leave a serious vacuum if those efforts were impeded. The proposed amendments are not in the best interest of our city. Furthermore, I have concerns that passing these amendments could embroil the city in litigation over possible Constitutional infringements.

Regards,

John Keating

1072 Prior Avenue South

Saint Paul, MN

Sent: Monday, October 25, 2021 9:47 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Amendments

Bill,

The city of Saint Paul is fortunate to have an interfaith network of churches, mosques, synagogues, and other religious organizations that collaborate to improve conditions for all of our residents. Through this network, temporary housing is provided for the unsheltered, meals are available to the hungry, and space to celebrate God's love for all is freely available.

As an example, my congregation at Fairmount Avenue United Methodist Church was a Project Home site before COVID. Each year, we housed several families for a month, providing meals and a warm space to sleep. We were proud to step in at a time of need, and hope that we will get to again soon.

If the proposed amendments to the zoning code are recommended for adoption, FAUMC and other houses of worship across the city may not have that chance. The good that these places provide, in the various and vibrant ways that they provide it, won't be able to grow to meet the needs of the future. Reflecting on the study that birthed these amendments and recognizing the reality of that particular situation, this feels like going "too far."

John Wesley, the founder of the Methodist movement, had three simple rules for living:

1. Do no harm.
2. Do good.
3. Attend to the ordinances of God.

The proposed amendments under discussion feel in conflict with these simple rules. At minimum, they will make it unnecessarily more challenging to provide hope, love, and joy to the Saint Paul community. I encourage the Planning Commission to not pass these amendments on to City Council.

Respectfully,

Scott Wendell (1350 Como Blvd E)

Council Chair, Fairmount Avenue United Methodist Church (1523 Fairmount Ave)

Sent: Monday, October 25, 2021 6:40 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning Bill - Proposed Change

Bill -

Good evening. My name is John Campbell and I am a parishioner at Holy Spirit parish and the parent of two students at Holy Spirit School.

I am writing to you to voice my strong opposition to the current proposal before the zoning commission. Not sure how this creates value for the city, but it will have a significant impact on the vibrancy of not only Holy Spirit parish but other religious institutions within the city.

Thank you for your thoughtful consideration.

John C. Campbell

1300 Medora Road

Mendota Heights, MN 55118

Sent: Friday, October 22, 2021 10:53 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Very important message

Greetings Bill,

As I understand it, a new zoning proposal is being brought forth next week at the Oct 29 meeting of which as noted below would have major implications and impact on religious organizations all throughout St. Paul.

I am HIGHLY OPPOSED to such a proposal. Churches, synagogues, etc. have been serving the poor, homeless, and the needy for THE LIFE OF THE UNITED STATES of AMERICA throughout history. The proposal on the table, IS A MAJOR OVERSTEP of the city in its misuse of power, is unconstitutional, preys on very frail people in its very own community which religious organizations SERVE, and restricts and squeezes the life-blood out of some already very vulnerable religious organizations who, especially as they climb back to some type of semblance after and/or still dealing with Covid-19.

For these reasons and many, many others, the city has no place in moving forward on the proposed zoning restrictions and as such should be taken OFF THE TABLE IMMEDIATELY.

It is more than high-time for the City of St. Paul to be a unifying force for ALL of its citizens in uplifting its community...not tearing it down.

Lani McCollar

cross streets: Bohland and Cleveland Ave.

The understanding for this new zoning proposal as demonstrated by Lumen Christi shares the following:

1) The city would no longer grant or authorize permits to religious institutions that want to build or renovate their facilities *unless these renovations were directly impacting the worship space or Kindergarten-8th grade education*. That suggests that if we wanted to add more meeting rooms to our building, enhance the Gathering Area, add more preschool classrooms or any number of improvements, a permit would not be granted.

2) This proposal would require religious institutions to obtain a permit to offer any other programming which is not directly related to religious formation. Thus, a bridge group, senior exercise classes, and any other social events or any other activity that might build up the community or be of service to the wider neighborhood, would require us to get an Activities Permit for every unrelated activity.

Sent: Tuesday, October 26, 2021 8:48 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious institution accessory use proposal

To Mr. Dermody and Whomever else This May Concern:

It has been brought to my attention that the City of Saint Paul is proposing changes that will severely restrict the ability of Saint Paul churches and religious institutions to build or add on to existing structures.

"Religious institution accessory uses include the following: (1) Child and adult day care; art, music, dance, adult and general education classes; after-school programs; religious education classes. (2) Community center, community meeting and performance space, receptions. (3) Counseling, social and community services. (4) Emergency housing and overnight shelter for up to ten (10) adults, along with any minor children in their care. (5) Food shelf. Standards and conditions: (a) **No building additions or new buildings may be constructed for the primary purpose of conducting a religious institution accessory use.**"

I am mortified.

Christian congregations preach the word of God during their services, but Christians are then to go into the world and live lives of service to each other and to others. **Providing fellowship opportunities and serving those in need in their communities are not "accessory" functions of the church- they are ESSENTIAL functions of the church.** If the City of Saint Paul is prepared to consider these activities to be of modest significance in a religious environment, is it prepared to consider them of modest value for the City of Saint Paul itself to participate in? **Will the city forego any new additions or constructions by the city for child care, art, music, education, community centers, performance spaces, community meetings, counseling, emergency housing, overnight shelter and food shelves?**

This proposal is a very bad idea. It's effect will be to constrain the practices of Christian life. It would be like telling City Council people that they can have all the meetings they want in their own building and

say anything they wish at such meetings as long as they performed no actions that had an effect on the community outside their walls

Please do NOT pass this proposed amendment.

Respectfully submitted,

Carl Hasbargen

1278 Lincoln Saint Paul

Sent: Tuesday, October 26, 2021 9:40 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious accessory use zoning amendment

Mr. Dermody,

The proposed zoning amendment regarding accessory building usage will have a severe impact on religious communities ability to fulfill their mission. The accessory usages as defined in the proposed amendment are traditionally and demonstrably critical for faith communities in their practice of religion. This proposed amendment violates the principal of religious freedom.

Rev. Arne Bergland

Interim Senior Pastor

Augustana Lutheran Church

West St. Paul

Sent: Tuesday, October 26, 2021 9:44 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Accessory Uses Zoning Study Hearing

I vote NO to this proposed zoning law change because it will restrict religious freedom and we live in a land where the constitution claims that we have the freedom to worship. This zoning will violate our Constitution first amendment.

Thank you,

Sister Mary

Sacred Heart of St. Paul

Staff

840 6th Street East

Sent: Tuesday, October 26, 2021 10:15 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Accessory Uses-PC PH 10.29.21.pdf (govdelivery.com)

Dear Mr. Dermody,

I would like to express my dislike for this possible zoning issue. I live in Saint Paul and I feel this is completely unnecessary. I'm unclear as to why this has become a possible change. Please consider my view as a Saint Paul citizen.

Thank you,

Brooke Iverson

1308 Avon St N

Saint Paul MN 55117

Sent: Tuesday, October 26, 2021 10:28 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: Marc Paveglio <frpaveglio@saintroseoflima.net>

Subject: Comments about Religious Accessory Uses Zoning Study

To whom it may concern,

My name is Marc Paveglio and I live at 2137 Marshall Avenue in St. Paul. I am also the pastor of a Catholic church in Roseville.

I am writing to oppose the proposed zoning changes (Chapter 65 of the Zoning Code) that would restrict the freedom of religious institutions. Religious institutions of all faiths, including Catholic parishes, provide a wide array of support to people of all ages – often regardless of a person's membership status, faith, or absence of faith. These standards and conditions are unnecessary and should be reconsidered in light of the amazing work of our area faith-based communities and their contribution to our city.

Sincerely,

Rev. Marc Paveglio

Father Marc Paveglio

Pastor

Glorify God. Follow Jesus. Love one another. Invite everyone.

Saint Rose of Lima Catholic Church
www.saintroseoflima.net

Sent: Tuesday, October 26, 2021 10:14 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning law change VOTE NO

I vote **NO** to this proposed zoning law change because it will restrict religious freedom and we live in a land where the constitution claims that we have the freedom to worship. This zoning will violate our Constitution first amendment.

Prisciliano Maya Rodriguez
735 Forster street
Saint Paul MN 55102

Sent: Tuesday, October 26, 2021 10:24 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: VOTE NO TO THE PROPOSED ZONING LAW

I vote NO to the proposed zoning law change. It restricts religious freedom in a country where the constitution states Freedom to Worship.

This zoning law violates the Constitution's First Amendment.

Ana Maya, MBA, CAMS
1800 Graham Ave
55116

Sent: Tuesday, October 26, 2021 9:14 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: I vote No

I vote NO to this proposed zoning law change because it will restrict religious freedom and we live in a land where the constitution claims that we have the freedom to worship. This zoning will violate our Constitution first amendment.

Thank You,

Patricia Martinez
Administrative Assistant

Sacred Heart Church
840 E 6th Street

St. Paul, MN 55106

Sent: Tuesday, October 26, 2021 10:29 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

Good morning Bill -

I recently learned about the proposed change in the zoning law that will be coming before the next Zoning Commission meeting this Friday. The church parish my family attends and the school my kids attend (Lumen Christi/Highland Catholic School) has been a good neighbor to the Highland Park community and partner to many local organizations that serve families in the area for over 75 years. I ask you to be considerate of how both of these proposed changes would restrict our parish and school ministries and sincerely ask you to oppose the changes. They would undoubtedly have an adverse effect on all religious institutions in Saint Paul.

Thank you,

Stacy Gianino

691 Kenneth St, Saint Paul 55116

Sent: Tuesday, October 26, 2021 10:44 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious zoning change

Dear sir,

Please do not meddle with the status quo. Our religious institutions do not need the hassle of unwanted and unwarranted zoning restrictions.

William McMahan
708 Woodlawn Ave.
St. Paul, MN 55116

Sent: Tuesday, October 26, 2021 10:50 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Sec. 65.916-918 Religious institution accessory use.

Dear Zoning Commissioners,

I am concerned about the proposed changes to the Religious Institutions Accessory Use code amendments (Ch. 65 Sec. 916-918). Our church and parish school is our hub for learning, sharing culture and resources, and celebrating life transitions. These are the trusted places our society needs most during these trying times of global pandemic, economic struggle, and social unrest. We need to support our religious institutions as pillars of good in our community. The proposed code amendment would restrict religious institutes' ability to adapt and respond to the needs of the times. It would constrain and limit the services provided for the community. I strongly disagree with the proposed amendment and hope that you do the same.

[Religious Accessory Uses-PC PH 10.29.21.pdf \(govdelivery.com\)](#)

Sincerely,

Jennifer Tacheny

Co-Directors Celeste's Dream: Young Adult Spirituality

Community Garden and St. Kate's/CSJ Food Shelf Contact

Sisters of St. Joseph of Carondelet, St. Paul Province

1884 Randolph Avenue

St. Paul, MN 55015

Sent: Tuesday, October 26, 2021 11:11 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious accessory uses zoning

Dear Bill,

I am writing regarding the zoning code amendments under discussion. I confess that I am perplexed about what purpose it would serve to restrict building and activity permits to religious institutions. Especially during recent times of civil unrest and public health and economic worries, many local churches have been bulwarks of stability and safety for the whole community. Providing public--non-religious--services for elders and children and those of us suffering from housing and food insecurity is fundamental to the mission of many religious institutions; to curtail such activity seems contrary to the common good.

Thank you so much for taking my comments into consideration.

Sincerely,

Michelle Hirschboeck

2124 Niles Avenue
Saint Paul, MN 55116

Sent: Saturday, October 23, 2021 7:51 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

Dear Zoning Commission and Who It May Concern:

My children attend Highland Catholic School, which is adjacent to Lumen Christ Church. If I am reading the proposed changes to religious institution accessory use, both the school and church would be severely limited from improving the buildings they currently utilize. They both have thriving communities that give back to the St. Paul neighborhood they reside near. Why would you NOT want such a vital part of the community to be able to remodel and expand if needed to meet the needs of the community? The former Ford Bridge land will be bringing in an influx of new residents, and Highland Catholic School and Lumen Christi Church are strategically planning to be able to meet the needs of those new residents. They will not be able to do this with the proposed revisions.

As I drive around St. Paul (and Mpls), I see many, many new apartment complexes that are being built. I think it would be prudent city policy to be able to also provide those new residents an option to send their kids to a fantastic Catholic school and attend a wonderful church in their neighborhood. I know many cities are trying to reduce the car traffic. If you do not allow current religious institutions to expand and remodel to meet current and future needs, those residents will have to drive out of the city for these services.

Thank you for taking the time to receive feedback from concerned citizens.

Lori Simpson

cross streets: Roy Street and Scheffer Avenue

Sent: Tuesday, October 26, 2021 11:30 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Cc: Stephen Lonetti <slonetti@beaconforthecity.org>; Mike Watters <mwatters@beaconforthecity.org>; Marlin Jones <mjones@beaconforthecity.org>
Subject: Religious Accessory Uses Zoning Study Hearing

October 26, 2021

Dear Mr. Dermody,

My name is Vangcha Lo, one of the Elders at Beacon of Hope Church, located on 850 Terrace Court, Saint Paul, MN 55130. On behalf of the elders and the congregation of Beacon of Hope Church, I am writing you this letter regarding the **Religious Accessory Uses Zoning Study Hearing** which will be held on Friday, October 29, 2021, at 8:30 a. m.

Since arriving from the refugee camp in Thailand back in 1980, a local church has been a foundation for my family's new life in the United States and Saint Paul has been my home. The local churches and their ministries are critical to the well-being of the communities, the spiritual needs and growth of the people. As the local churches grow, there will always be the need for expansion in various ministries , as a result, it requires additional facilities to accommodate the growth and needs of the congregants. With this being said, I am writing this letter to implore you to say "**NO**" to the **Religious Accessory Uses Zoning Study Hearing**. The **Proposed Religious Institution Accessory Uses Code Amendments** are NOT good for the city of Saint Paul, its communities, and ALL the people of faith. The Uses Code Amendments will strictly limit our freedom to grow and worship and totally go against our religious freedom granted by the United States Constitution to have the freedom to worship freely. Again, I am imploring you to say "**NO**" to this **Proposed Religious Institution Accessory Uses Code Amendments, Secs. 65.916-95.918**.

I thank you in advance for not allowing this Proposed Religious Institution Accessory Uses Code Amendments to pass.

Respectfully,

Vangcha Lo, Elder, Beacon of Hope Church

Sent: Monday, October 25, 2021 5:21 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning restrictions

Absolutely unconstitutional to restrict religious places of worship for construction!
Talk about prejudice! This is the ultimate!!!

Sally Khan
cross streets: View and James

Sent: Tuesday, October 26, 2021 10:46 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Zoning

I oppose the proposed changes to the Religious Zoning in St Paul.

Kathleen Culligan
Highland Park -Juno Ave & Finn St

Sent: Tuesday, October 26, 2021 10:59 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>; #CI-StPaul_Ward3
<Ward3@ci.stpaul.mn.us>

Subject: Proposed zoning changes for religious institutions

Hello Bill,

I am submitting the following comments for the Planning Commission's meeting on October 29,2021 regarding the proposed zoning changes for religious institutions. While it is reasonable to separate the zoning codes regulating religious institutions from residential zoning codes, the proposed language is much too restrictive, would have significant negative impacts on religious organizations and represent a serious overreach by the city.

Religious institutions provide a variety of important activities and services beyond religious services to both their members and the broader community. All five definitions of accessory use are critical services or important activities for building and supporting community. Further, the ability to offer counseling services, overnight shelters, food shelves and more meet critical community needs and help shift the burden from public services. By restricting the ability to expand or build to accommodate religious accessory use, the proposed codes would effectively limit the ability of religious institutions to make independent decisions on how they can best meet the needs of their members and the community.

This is an example of unnecessary overregulation by the city with significant negative impacts. I am strongly opposed to the proposed zoning changes as written and recommend against approval. Thank you.

Sincerely,

Michelle Doyle

Highland Park Resident

1878 Hampshire Ave, St Paul, MN 55116

Sent: Tuesday, October 26, 2021 10:42 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Opposition to Religious Accessory Uses Zoning

Mr. Dermody,

As active members of both The Church of the Assumption and Lumen Christi Catholic Community, we are writing to voice our strong opposition to the proposed changes.

These proposed changes are extreme government overreach and a hostile move against organized religion and the rights under the constitution for the freedom to worship as we wish without government interference.

The churches should be allowed to modify their spaces and community offerings without government interference, These services provide opportunities for community outreach and charity which do not need the permission of the city to proceed for the betterment of the citizens of St. Paul. They are private organizations and should be treated as such.

Thank you,

Brian and MaryClaire Edwards

cross streets: Marie Avenue and Lexington Avenue in Mendota Heights

Sent: Tuesday, October 26, 2021 1:39 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessories Uses Zoning Study

Mr. Dermody:

I'm writing to express concern about some of the impacts of the Religious Accessories Uses Zoning study and subsequent proposed code amendments. I am a member of Lumen Christi Catholic Community and have been made aware of some of the ramifications of this study. Specifically, I am concerned that it will now limit any future building additions such as additional meeting space or pre-K classroom additions or could require permits to expand many activities that have been found to be supportive activities for various members such as seniors. I intend to join the call on Friday to hear more about these proposed code amendments, but I fear that they will stifle future plans for our religious institutions — which offer much life to the community. Please reconsider the limits this study will impose.

Regardless of the outcome, I am grateful for your public service.

Margaret George
1606 Saunders Avenue
Saint Paul, MN 55116

Sent: Tuesday, October 26, 2021 2:00 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: I oppose the Religious Accessory Uses Zoning

Dear Mr. Dermody,

I strongly oppose the Religious Accessory Uses Zoning, " ARTICLE VII. 65.900. ACCESSORY USES" for the following reasons:

1. It is impossible to implement the zoning code without violating The Religious Land Use and Institutionalized Persons Act. Most glaringly, the code unconditionally prohibits religious institutions from erecting new buildings for religious accessory purposes, *even* for the primary purpose of religious education classes. The code clearly violates RLUIPA by imposing an unjustified, unconditional prohibition that restricts the religious exercise of assemblies.

a) In view of the above consideration, I believe that St. Paul City is setting itself up for further litigation in higher courts.

3. As the code implies, religious institutions provide invaluable resources and services to the community. The zoning code places significant burdens upon religious institutions that may hinder or prevent the offering of such community services.

a) If the purpose of the zoning code is achieved, the community members will suffer the lack of these resources, services, and social offerings.

b) The government may acquire the responsibility of providing similar services, which will accrue a cost to the government, and hence to our taxpayers.

Sincerely,

Maria Philips

12833 Briar Court Apt 6

Burnsville, MN 55337

Sent: Tuesday, October 26, 2021 2:25 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Religious Institution Accessory Uses Code Amendments

Hi Bill,

Please do not pass the proposed amendments to the Religious Institution Accessory Uses Code. Places of worship need to be able to meet the temporal needs of the community in addition to the spiritual needs. These proposed amendments severely limit the ability of places of worship to do so. In addition, not approving projects that would give more room for religious education is totally contrary to our freedom of religion - it is wrong, plus it would tie up St Paul in needless and pointless litigation, wasting time and money. Please do not allow these amendments to move forward.

Thank you.

Steve Ray

2459 Oxford St N

Roseville, MN. 55113

Sent: Tuesday, October 26, 2021 2:54 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses

Hello Bill, I am writing you to express opposition to the proposed Religious Institution Accessory Uses Code Amendments.

The proposal of these amendments implies the city seeks to oppress the future growth and development of all religious institutions. If that is not the case, the proposed standards and conditions must be softened significantly.

Mike DeRosia
1704 Pinehurst Ave

Sent: Tuesday, October 26, 2021 11:11 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Use zoning - letter with address

Hello Mr. Dermody,

As a Systems Thinker and a City Planner, you surely are aware of the connections between a Community of People, and the impact that community has on a city's Quality of Life.

Adjusting the inputs to this community (system) will certainly impact the outcomes to our city.

We only need to look at the history of Rondo to see how a community's destruction at the hands of well-meaning city planners can go horribly wrong.

Now, the last 19 months of Pandemic Life have highlighted humanity's deep need for Community. And while some people might find a community on their computers, many more people yearn for in-person connections. We've evolved as social creatures, and when the pandemic ends, we will no doubt return to our social behaviors.

At the same time, the pandemic's restrictions have weakened the social bonds that keep communities healthy. Crime has risen in Saint Paul, and law enforcement has dropped.

If we have any hope to maintain strong communities, through and after the pandemic, it's imperative that we support the neighborhood, non-governmental institutions that build those communities.

That's why I am writing to oppose the changes to Religious Accessory Use Zoning per Sec. 65-919.

As a recently-returning church-goer, I have met new people at church that I wouldn't know otherwise. They've become friends, customers, and service providers. Together, we're building the community and providing services to others, regardless of religious status.

This wouldn't be possible without the space in our church to work. To meet and talk and make friends and plans. Because a religious community isn't only about worship, but also about improving the lives of others.

Please do not change the Religious Accessory Use zoning. It's against our communities' better interests. It overly impacts low-income neighborhoods that have fewer places to congregate. And it works against the betterment of our city planning.

Thanks for your time,

Jeffrey Thomas

2015 Morgan Avenue

Saint Paul Minnesota 55116

Sent: Wednesday, October 27, 2021 10:44 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed changes to Religious Accessory Use zoning

Hello Mr. Dermody and the Saint Paul Planning Committee,

I oppose your changes to the zoning regulations for religious institutions. These locations are used by communities for all sorts of activities. Limiting their use with 'conditional permits' takes the power out of the people's hands and gives it to the whims of a permitting authority.

Please support the people of Saint Paul by not making the proposed changes to Sec 65.919

https://content.govdelivery.com/attachments/STPAUL/2021/09/17/file_attachments/1938931/Religious%20Accessory%20Uses-PC%20PH%2010.29.21.pdf

Thank you,

Jeffrey Thomas

2015 Morgan Avenue

Saint Paul Minnesota 55116

Sent: Thursday, October 28, 2021 8:38 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Opposition to changes for Religious Accessory Use

Hello Mr. Dermody,

Please do not make the proposed changes to Saint Paul's Religious Use Zoning rules,

https://content.govdelivery.com/attachments/STPAUL/2021/09/17/file_attachments/1938931/Religious%20Accessory%20Uses-PC%20PH%2010.29.21.pdf

These civic services help strengthen Saint Paul's communities. By making these changes, you're directly impacting our communities in a negative way.

The impact is largest among the lower-income segments of our population. **I would hate for your short-sighted decision to exacerbate racial or class divisions in Saint Paul. That's not what we stand for.**

Keep Saint Paul livable for everyone.

Jeffrey Thomas

2015 Morgan Avenue, Saint Paul, Minn 55116

Sent: Tuesday, October 26, 2021 6:08 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Proposed Amendments

Der Council member Bill Dermody,

If my understanding of the proposed religious Institution Accessory Uses Code Amendments is correct, I am appalled at the short-sightedness of this amendment. There are so many tragic situations that face all of us today; some of which are or will be new to St. Paul and to our churches. Why restrict what churches are able to do to support those who are the neediest in our city? I am a member of Lumen Christi Catholic Community in the highland neighborhood of this city even though I live in West St Paul and want to continue to see faith-communities able to respond in socially responsible ways.

As you are well aware, churches and schools in St. Paul have been mainstays of life in this city. Education, social services, programs for elders and immigrants have been offered here since the mid-1880's when St Paul was just being established. Is there any room for new needs to emerge? New edifices that may be needed to meet new needs in the future of this city? At a time when we are just beginning to realize the effects of global warming and the climate crisis and the mass migration of people that will take place because of flooding of coastal towns and cities and island dwellers will all be needing a home in mid-America? What if churches decide to invest in solar farms to create alternative energy sources? What if we offer garden space to grow healthy food on parish grounds? Will these efforts be forbidden? What if we as a community want to provide affordable housing on Church property?

Please, let's continue the welcoming attitude of the past as be open to new ways of providing building and lands to provide for future homes and places of belonging in our city.

Sincerely,

Kathleen Storms, SSND

Kathleen Storms, SSND

222 Wentworth Ave. West #110

West St. Paul, MN 55118

Sent: Tuesday, October 26, 2021 6:28 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: No to new Zoning Law

The new zoning law being proposed Friday is unconstitutional and inhibits religious freedom. The Church is more than just worship and the schools, it is community.

You are in our prayers.

God Bless.

Leah Heselton

Communications Coordinator

651-357-1215 | lheselton@saintroseoflima.net

Saint Rose of Lima Catholic Church

2048 Hamline Ave. N. Roseville, MN

www.saintroseoflima.net

Sent: Wednesday, October 27, 2021 8:25 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: zoning changes for churches

Mr. Dermody,

I am truly puzzled by the proposed zoning ordinance change affecting churches. We currently have the worst crime wave in the history of the city, exorbitantly high taxes and crumbling streets and a mayor who has hired all of his friends for jobs like resiliency director. Given all that, messing with the churches

seems like such a waste of time and energy. Seems like they are making up problems that do not exist for the purpose of looking busy.

I have lived in St Paul my whole life and I don't recognize it any more. Government seems to have its own agenda and certainly isn't listening to its citizens. We are slowly turning our beautiful city into another Baltimore which is basically uninhabitable for normal people.

Instead of harassing the churches effort should be spent on stopping the carjacking, killing and shooting, is that too much to ask ????

Michael Quayle

1830 Pinehurst

St Paul MN

Sent: Wednesday, October 27, 2021 9:39 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: RE: Religious Accessory Uses Zoning Study

I want to voice my concern on this ordinance change.

I am a council member for Faith Lutheran Church located at 499 Charles St in St Paul.

We rely on the rental of our gym and other areas of the church to groups for an added source of income. Our outside groups range from those having craft sales to Metro Deaf School to Recovery Café Frogtown. The numbers have never exceeded over 100. And if they did, we would have ample parking lot space available for them.

If you did change the ordinance, it would mean our church doors closing as we are relying on this added revenue to help our church keep our head above water.

When looking at changes to this ordinance, we are not housing homeless people. We do offer a free clothing store, with a small food shelf and help from the Humane society with dog and cat food, please consider all the people you would affect.

Our church helps a lot of the community and we wish to continue to do so.

Please keep things the same. Do not require us to have to take out a permit in order to keep helping the community as we do. That money is better used to keep our doors open.

My home cross streets are Hawthorne & Weide, but my church is Charles & Mackubin.

Michelle



Michelle Lewis

Transportation Coordinator 2, Transportation Dept.

Saint Paul Public Schools • 261 Chester St, St. Paul, MN, 55107

Office: 651-696-9600 • Fax: 651-265-0910

spps.org

Sent: Tuesday, October 26, 2021 5:22 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning Changes for Churches

To Whom It May Concern,

My name is Kelsey Irizarry and we are parishioners at Lumin Christi Catholic Church in St. Paul. Our kids also go to Highland Catholic. I am writing you to request that you not pass the Zoning changes for religious institutions. This would inhibit Highland Catholic and Lumin Christi's growth. And the success of a small Catholic school is tied to a healthy parish.

Thank you for your time,

Kelsey Irizarry
Beautycounter Consultant
Certified Google Educator

1882 Wordsworth Ave.

Sent: Wednesday, October 27, 2021 11:16 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject:

I vote NO to this proposed zoning law change because it will restrict religious freedom and we live in a land where the constitution claims that we have the freedom to worship. This zoning will violate our constitution first amendment.

Thank you

Fr Edison Galarza

Pastor Sacred Heart of St Paul

Sacred Heart Church
840 E 6th Street

St. Paul, MN 55106

Sent: Friday, October 22, 2021 12:08 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Accessory Uses

Mr Dermody,

I oppose any changes to zoning pertaining to Religious Accessory Uses.

This is a clear case of government overreach. I am appalled that this sort of thing is proposed and being seriously considered.

There is simply no reason to attempt to regulate religious institutions and their use of their own property, which as you know, is protected by the U.S. Constitution.

Sincerely,

Terrence M Sullivan
Eagan
Owner of a rental at 1377 Randolph Ave
Holy Spirit parishoner

Sent: Wednesday, October 27, 2021 2:04 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Against proposed change in zoning law

Bill Dermody

Chair of the Zoning Commission

Dear Bill,

As a member of the Holy Spirit Parish community, I **strongly object** to the proposed changes in zoning law that is coming before the Zoning Commission meeting on Friday, October 29. These changes exhibit an overreach that, by limiting permits, would restrict our parish and school ministries and needlessly limit our flexibility to make improvements in our resources as we make future changes in our ministries.

Thank you for your attention to this very important matter.

John van Ingen

2108 Palace Ave.

St.Paul 55105

Sent: Wednesday, October 27, 2021 11:56 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed zoning changes for churches

Although I attend church in Minneapolis I do live in St. Paul and I want to express my stern opposition to the proposed zoning laws regarding church property.

A church building is not just for praying. You recognize the K-8 need, but then ignore Pre-K needs for religious education and child care during services. You ignore high school teen religious education and youth groups. You ignore on-going prayer groups and adult education. All of these are part of the prayer life of a community, even if it's in a meeting room instead of the prayer space. Even post-service coffee and donuts and potlucks serve to strengthen the prayer-life of the community and sometimes simultaneously address church business.

The church is supposed to look outward, not only inward. It is supposed to be a part of the community, not a recluse from it. Offering and renting space to groups like AA, peace groups, neighborhood action groups helps the church to fulfill it's mission, that of building the Kingdom of God here on earth.

Please do not approve the proposed changes.

Tom Eckhardt

1800 Graham Ave #422

St. Paul, Mn

55116

Sent: Tuesday, October 26, 2021 2:27 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning proposal

Hello,

I am a member of Lumen Christi church in Highland Park. I am very concerned about the new zoning proposal. As our church name states we are Lumen, a light to shine in the neighborhood. With that purpose in mind hosting things for the neighborhood and doing outreach is part of our mission. Whether it is church "business" or not, we must build community. This proposal would make it difficult for us to do just that.

Please consider a no vote on this measure.

Thank you,

Teri Parker Brown

My address is 7538 Alpine Court Inver Grove Heights.

The church is Lumen Christi at Bohland and Cleveland.

Sent: Wednesday, October 27, 2021 3:52 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: NO to the Religious Accessory Uses Zoning Study

I cannot believe this shameful idea is even being brought up for discussion. Religious institutions have been providing needed services to their communities and neighbors since the colonial period. They have been filling the gaps of feeding and clothing the poverty stricken that governmental institutions have been unable to fill. With the growing income gaps between the social classes we are seeing a growing need for services to fill these gaps for those less fortunate. With this, comes the need to grow and extend our religious institutions footprint. By preventing our institutions to grow to meet the needs of our communities, you are shutting the door in the face of every person who is asking for help!

This zoning study goes against the rights of all religious groups and communities and against every citizens right to receive needed food, clothing and services.

I beg that you SHUT this study DOWN!!

Julia Sherman
1048 Carmel Court
Shoreview, MN 55126

Sent: Wednesday, October 27, 2021 1:32 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning and Churches

Chair Dermody -

I am a member of the Lumen Christi Catholic community. I am writing about the zoning changes currently being proposed which negatively affect churches and religious schools. Although there must be some reason for the proposed zoning changes, it is clear that they would have significant negative consequences for our church and school - and I'm sure many others as well. These proposed changes would severely impact the ability - and rights - which private, nonprofit organizations currently have to build, expand or alter much of their physical buildings.

I am opposed, as are my wife and many other members of our parish, to this discriminatory and unnecessarily restrictive government intrusion. It certainly has the appearance of lack of separation of church and state as well.

I urge you and the planning commission to drop this proposal permanently.

David Miller
1650 Celia Rd., Mendota Heights, 55118
Parishioner, Lumen Christi Church

Sent: Wednesday, October 27, 2021 5:48 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>; #CI-StPaul_Ward7
<Ward7@ci.stpaul.mn.us>

Subject: Religious Accessory Uses Zoning Study

To Saint Paul Planning Commission:

I am writing to express my opposition with the zoning changes planned for Religious Entities. Churches serve the St. Paul community in so many necessary and needed ways it is difficult for me to understand why you would even consider this change.

Following are some of the key ways churches serve the community. If they were no longer able to provide these services due to the fees the city is charging or all the paperwork involved, is the City of St. Paul able and capable of taking over these necessary activities that serve the most negatively impacted communities?

- (1) Child and adult day care; after-school programs;
- (2) Counseling, social and community services.
- (3) Emergency housing and overnight shelter for up to ten (10) adults, along with any minor children in their care.
- (4) Food shelf.

I am also concerned about the direct impact these changes will have to the recovery community. Churches are a main resource for A.A., Al-Anon, Alateen and other recovery related meetings and services. In many cases, meeting space is not readily available or affordable for groups to meet. Commercial real estate owners are not always welcoming to these groups. Again I ask, is the City of St. Paul able and capable of taking over these necessary community activities if churches become unavailable and unable to serve our most negatively impacted populations?

I respectfully ask that you VOTE NO to these changes at your upcoming planning commission meeting.

Laird and Denise Anderson

25 Battle Creek Road

St. Paul, MN 55119

Sent: Wednesday, October 27, 2021 6:40 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>; #CI-StPaul_Ward4
<Ward4@ci.stpaul.mn.us>

Subject: Zoning changes for religious entities...

To Saint Paul Planning Commission:

I am writing to express my opposition with the zoning changes planned for Religious Entities. Churches serve the St. Paul community in so many necessary and needed ways it is difficult for me to understand why you would even consider this change.

Following are some of the key ways churches serve the community. If they were no longer able to provide these services due to the fees the city is charging or all the paperwork involved, **is the City of St. Paul able and capable of taking over these necessary activities that serve the most negatively impacted communities?**

- (1) Child and adult day care; after-school programs;
- (2) Counseling, social and community services.
- (3) Emergency housing and overnight shelter for up to ten (10) adults, along with any minor children in their care.
- (4) Food shelf.

I am also concerned about the direct impact these changes will have to the recovery community. Churches are a main resource for A.A., Al-Anon, Alateen and other recovery related meetings and services. In many cases, meeting space is not readily available or affordable for groups to meet. Commercial real estate owners are not always welcoming to these groups. **Again I ask, is the City of St. Paul able and capable of taking over these necessary community activities if churches become unavailable and unable to serve our most negatively impacted populations?**

I respectfully **ask that you VOTE NO** to these changes at your upcoming planning commission meeting.

Judy Halabrin and John Fisch

1721 Portland Avenue

St. Paul, MN 55104

Sent: Wednesday, October 27, 2021 9:29 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Re: Proposed Change in Zoning Laws, Item IV, Public Hearing: Religious Accessory Uses Zoning Study for October 29, 2021 Meeting

October 27, 2021

Mr. Bill Dermody

St Paul Planning Commission

Re: Proposed Change in Zoning Laws, Item IV, Public Hearing: Religious Accessory Uses Zoning Study for October 29, 2021 Meeting

I am writing to you to express my opposition to these two proposals that would affect physical changes that could be made to churches or schools' plants in order to better serve the members of that church or school, as well as the limitation of any future services that could be rendered at these sites to serve its community members and those non members from the surrounding area.

I want to express my outrage at these proposed items. They are a serious assault against our religious freedom in the city of St. Paul, MN. In my seventy-four years as a resident of the city this is the most serious attempt, I can recall, to remove our religious freedoms provided by the constitution of our country. The government of St. Paul, MN is trying to limit our religious freedoms. I believe your taking serious risk of litigation if you continue to pursue these two proposals for both our city and the various religious institutions in St. Paul.

Mr. Dermody, in your LinkedIn Bio on the internet, you state you are focused on strategically improving the quality of life in St. Paul, now and in the future. This is what the religious churches and schools have already been doing since the beginning of our city. Now with these proposals you want the government to limit any future needs for the church members, their families and their children. Your proposed actions do not seem to follow what you have in your bio. These institutions have already been serving the needs of its immediate community and local community. They provide education needs, day care needs, housing and food needs. These proposals would stop all additional services or improvements going forward that our community might need.

Fortunately, there are laws already on the books to protect religious institutions and their property. City Planners, who are paid or appointed, have no right to change these laws and or our basic rights.

Please put an end to this study.

Sincerely,

James M Slagle
1125 Daven St
St Paul, MN 55116

Sent: Wednesday, October 27, 2021 10:51 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

The proposed changes to restrict parish buildings or renovations, and to require permits for new programming would both adversely affect Lumen Christi, ny parish, and I hope they are not recommended.

Larry McIntyre

208 Mississippi River Blvd S

Sent: Wednesday, October 27, 2021 10:58 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning issue

Hello, Mr. Dermody.

My name is Kelly Maynard. I am a parishioner at Lumen Christi Catholic Community, a parent of a Highland Catholic student, and I live within walking distance to both entities, just up the street on Beechwood, between Snelling and Macalester.

I write in opposition to the change in zoning laws. I am very concerned about how such a change would restrict Lumen Christi's ability to be a gathering space for all manner of activity. Both the church and the school offer spaces for groups from both the parish and the wider community, and both entities are tremendous assets to the neighborhood.

Many of the vibrant religious communities in the Highland Park neighborhood provide homes for activities ranging from book sales to block parties to temporary shelters and meal programs. These all add to the richness and variety of activities in the area.

I object to the restriction of area religious institutions from being able to build or expand, and I object to restricting their ability to obtain permits. Such limits will negatively impact these institutions and their ability to continue to provide space, fellowship, support and charitable outreach to their neighborhoods. This will be a loss to all.

This change would be an unfair restriction and an overreach of power.

Sincerely,

Kelly Maynard

1587 Beechwood

Sent: Tuesday, October 26, 2021 4:39 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: zoning study

re: zonng study on religious institutions

1) Zoning permits expand as exwould greatly impact any reiiigious institutions to expand as necessary to properly handle any increase in necessary space to handle any increase in space required to handle an increase in parishioners and/or students. An example would the Impact in Highland with the pending construction iof the Highland Bridge.

2) Why would you need to have a permit for parish activities that have been going on for years. THese are necessary programs that help build community and give people things to do. It would also require additional staff in the city to handle the requests.

I strongly suggest you reconsider the need for these changes.

Larry & Charlotte Ritter

2023 Bordner pl

st paul 55116

Sent: Thursday, October 28, 2021 9:16 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Limiting use of religious institutions

Hello

I just now read of the proposed changes to usage of religious buildings/institutions by limiting other groups. Although I haven't heard the details of this proposal, I object. I have been a pastor for many years (not currently serving a church) and there are many, many reasons why it was beneficial for our community to keep an open door to others. Over the years, my churches have hosted AA groups, childcare programs, mothers groups, book clubs, weight loss groups, community meetings, Lions Club, and more. It is essential to my beliefs to keep open lines of connection and care to other groups - people of many faiths - people of no faith, etc. It seems very strange that right now, as we are still in the midst of an isolating pandemic, that there would be a community proposal to limit gatherings rather than encourage them. Proper health safety protocols can still be implemented, even with our current health concerns. This seems to be a very odd plan.

Thank you for hearing my concerns-

Rev Joanne Sorenson
1610 Ford Parkway
St Paul, MN 55116

Sent: Thursday, October 28, 2021 10:58 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: The restriction on Religious groups in ST. Paul

Dear college

I am pastor in Mindekirken, The Norwegian Memorial Church, Minneapolis.

I am very concerned about the information that ST. Paul will make restrictions on religious groups when they need to expand their space for community building reasons. I want to support your protest as much as I can, so please tell me if there is something we can do.

Best regards

Gunnar Kristiansen

Pastor in Mindekirken

924 E 21st St, Minneapolis, MN 55404

Sent: Thursday, October 28, 2021 11:18 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Proposed Zoning Code Amendments (65.919)
Importance: High

Hello Mr. Dermody,

I want to express my opposition to the proposed zoning code amendments (Section 65.919) regarding religious accessory uses. Religious institutions do a tremendous amount of good in the communities where they physically exist. In fact, in many cases, religious institutions do more than the government is capable in providing social and community services. These proposed zoning code amendments would place an undue administrative and financial burden on religious institutions and limit the good work that they do in support of the poor and underprivileged. I urge the Planning Commission to reject these proposed zoning amendments.

John R. Adams

640 Overlook Drive

Roseville, MN 55113

Sent: Thursday, October 28, 2021 11:54 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Opposition to Proposed Changes in Zoning Law - Religious Accessory Uses

Mr. Dermody:

I have been a member of Lumen Christi Catholic Church (Cleveland and Bohland Aves.) for several years and my three children attend Highland Catholic School (Kenneth St. and Bohland Ave.). I am writing to express my concerns and opposition to the proposed changes in zoning law as it pertains to religious accessory uses.

These proposed changes would severely restrict the flexibility our school and parish have to respond to the evolving needs of the local community. Although my family lives across the river in Minneapolis, we chose to join this church and school several years ago, largely in part because it demonstrated an incredible ability to meet and adapt to the challenges that face today's neighborhoods. Highland Catholic School goes above and beyond in its flexibility in meeting the needs of diverse learners and corresponding learning challenges. And Lumen Christi Catholic Church has been a strong neighborhood partner in its commitment to social welfare and the well-being of the community at large. By restricting the church and school's ability to expand and build to meet these needs, we put the parish and the neighborhood at great risk. My professional background lies in program development and innovation, and I can't help but view this proposal through that lens. Companies, churches, schools, and communities thrive when they have the ability to adapt and respond to the economic and social forces of society. They fail, slowly but surely, without that agility.

Thank you very much for the opportunity to share my concerns and for relaying them to the zoning committee.

Best regards,

Becky Falkum

4517 29th Avenue S.

Minneapolis, MN

Sent: Thursday, October 28, 2021 8:57 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Use of religious property

I have lived in the Highland Park neighborhood for over 30 years and am a long time supporter of living in St.Paul. I want to express my opposition to the proposed zoning rule changes regarding the expansion of church property and the permitting of uses of that property. Our church community has participated in a number of social justice activities and community building activities in the past and the limitations that zoning and permitting would place on these contributions is short sighted. The benefits of government involvement in curtailing these efforts is not apparent. Please reflect this input in your decision making about zoning requirements

Susan Hoffert

1649 Scheffer Ave. St. Paul 55116

Sent: Thursday, October 28, 2021 11:04 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Banning non-worship services

Mr Dermody,

As I read the proposed plan EVERY activity at church, temple or synagogue that is not directly related to worship will need a permit. Seriously? This would mean that all education classes, book sales, planning for resettling Afghan families, bridge for seniors, organizing for donations to poor families, social activities for seniors, yoga, first aid classes, the list is endless.

Do not follow through with this proposed plan—please.

Kelly DeRosier
1655 Eleanor Ave
St Paul, MN 55116

Sent: Wednesday, October 27, 2021 3:50 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

Bill,

My family and I have been members of Lumen Christi for over 20 years and have always been proud of how interactive with the larger community our parish has been. I have also seen that same type of interaction with many of the other religious institutions in our city.

It makes no sense to me that the city would want to limit that outreach to the broader community by changing how it allows religious institutions to operate while doing that outreach. The work that is done and the activities that are held at our church are run by volunteers with no government intervention. This has been a successful way to operate for decades and I see no reason to change it. My children who are now all grown benefitted immensely by seeing how they could help the broader community, especially through Families Moving Forward, and to understand that not every family has the advantages that ours did. Also, the overreach by the city to require permits for some many activities that have run smoothly without a permit for many years, is mind boggling. It seems like another way for the city to make money which could go to help pay for the activities that that we offer our community for free. Religious institutions are struggling financially in so many ways. It is absurd to say the least.

Please reconsider changing these policies and what that affect will have on our community.

Thank you for your time,

Debra Maeurer

1399 Sumner St., St. Paul 55116

Sent: Wednesday, October 27, 2021 3:52 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Accessory Uses Study

Hello Mr. DERMODY,

I would like to express my anger and disappointment in the St Paul Zoning Commissions proposal to restrict institutions from renovating their facilities or build new ones unless it directly impacts the worship space or K-8 education. It would also require permits for all programing not in relation to religious formation. Religious organizations of every affiliation do marvelous work in lifting up the poor , some of whom are struggling through no fault of their own. I believe it is sinful to limit these houses of worship in the Lord's command to serve the poor.

Please rethink your proposal to put this restriction through to hamper this vital work being done at the houses of worship in the City of St. Paul.

Thank you,

Margaret Clarkin

1618 Hollywood Ct

Falcon Hts., MN 55108

Corpus Christi Catholic Church, Roseville MN

Sent: Thursday, October 28, 2021 1:27 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Religious Institution Accessory Uses Code Amendments

I am opposed to all changes being proposed in the following zoning code.

Dan Norris
1547 Sextant Ave W
Roseville, MN 55113

Sent: Thursday, October 28, 2021 1:47 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Fwd: Religious Accessory uses zoning

I strongly oppose this proposal. Are you attempting to force out religious institutions.
I assume this includes all not just Christian institutions.

Karen Schmitt.
cross streets: West 7th and Randolph.

Sent: Thursday, October 28, 2021 10:37 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning Code amendments pertaining to the Religious Accessory Uses Zoning Study

Dear Mr. Dermody,

I strongly oppose the proposed zoning code amendments regarding Religious Accessory Uses. This is an unnecessary action and a strong overreach of government.

Best regards,

Gary Collins
Near Fairview and Wellesley Avenue - 55105
St. Paul, MN.

Sent: Thursday, October 28, 2021 2:54 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning Issue

I am writing to express my opposition to the proposed zoning changes for religious institutions. While I do not live in St. Paul, I would not like to see this voted in or expand to neighboring communities.

Regards,
Liz Halberg
1675 Ridgewood Ln. S.
Roseville, MN 55113

Sent: Thursday, October 28, 2021 3:15 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Cc: Peter Probst <vivalapeter@aol.com>
Subject: Proposed Change in the Zoning Law for Religious Institutions

Good Afternoon, Bill,

As a member of the Lumen Christi Catholic Community and a parent with children at Highland Catholic School, I am writing to you today to ask that you please vote against the proposed change in the zoning law that will have adverse effects on all religious institutions in St. Paul. It is my understanding that there will be a vote on this proposed change during your meeting tomorrow morning.

It is also my understanding that this proposed change would have two major effects impacting all religious institutions in St. Paul:

- 1) The city would no longer grant or authorize permits to religious institutions that want to build or renovate their facilities unless these renovations were directly impacting the worship space or Kindergarten-8th grade education. That suggests that if our church or school wanted to add more meeting rooms to our building, enhance the Gathering Area, add more preschool classrooms or any number of improvements, a permit would not be granted.
- 2) This proposal would require religious institutions to obtain a permit to offer any other programming which is not directly related to religious formation. Thus, our bridge group, senior exercise classes, other social events or any other activity that are intended to build up the community or be of service to the wider neighborhood, would require us to get an Activities Permit.

I believe these proposed changes would severely restrict our parish and school ministries. Therefore, I am asking you to please vote against these proposed changes (and simply put, further government overreach).

Thank you for your consideration.

Erin Probst
1927 Saunders Avenue
Saint Paul, MN 55116

Sent: Thursday, October 28, 2021 3:25 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject:

Bill,

As a resident of St. Paul, I am opposed the the proposed zoning changes for churches. I am sure the city is looking far and wide to increase revenue but churches are not the place. The outreach programs offered provide support for not only their own congregations but the entire community at large, at no cost to the city. To restrict them with additional regulations seems quite unnecessary, rather intrusive and excessively controlling- and for what purpose. Their funding, unlike our city, is totally dependent on volunteer funding. What they get in the plate on Sunday is what they get to pay their bills - rather unpredictable. The past 20+ months have proven to be a challenge beyond words and now the city wants to put additional administrative and financial burdens on these struggling institutions- I want to know why.

Mary Michel

1731 Summit Avenue

Sent: Thursday, October 28, 2021 5:09 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Zoning Issue

Dear Bill,

The Zoning issue proposed concerning religious spaces is one I oppose, as it seems to discriminate against religious groups! The church is always reaching out to the people who need our services! That reality is constantly growing and changing in our city. I do not support any zoning issue that would prohibit the building structures needed to serve our people. If the pandemic has taught us anything, is that our reality changes quickly to meet the needs of people of all ages. This is how churches minister to the people of our city of St. Paul!

Sincerely,
Sister Mary Fran Allen
Lumen Christi Parish
2055 Bohland Ave

Sent: Thursday, October 28, 2021 1:47 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject:

Please do NOT change the zoning for churches, synagogues, mosques and other gathering places for worship. We will not be able to accommodate necessary changes to serve our communities!

Beverly Gilmore-Engdahl

1181 Edgcumbe Rd, St Paul, MN 55105

Sent: Thursday, October 28, 2021 9:24 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Leave things alone

I have been on hold to contact you about your upcoming meeting on Friday on building uses. LEAVE it ALONE

As a taxpayer I see what good is being done. What in the world are you thinking with all that is going on today?

We need organizations to help support people since the City seems to be falling behind. Times are really hard for

A lot of people and you surely are not helping. Shame on you.

Mary Schaak

Highland between Fairview and Snelling

Sent: Thursday, October 28, 2021 9:30 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Cc: Ryan Rehkamp <rrehkamp@lumenchristicc.org>; pfeela@lumenchristicc.org;
mbisanz@lumenchristicc.org
Subject: Religious Accessory Uses Zoning Study

Bill, there are many objections to the attempt to infringe on our religious liberty. Government has no right or authority to dictate how religious institutions can use their property. Our freedom to participate and exercise our faith spiritually in the space we deem necessary is not in any way shape or form up to City, State or National government entities. Many churches and synagogues including Lumen Christi organize and provide healthy community activities in our current spaces. Each church and synagogue leaders have done an excellent job over many years providing help to all citizens in the community. Let's let our religious leaders continue leading and providing support and developing their space to support the community as well as their members who devote their resources, time, treasures and energy.

1. The prohibition on any future development or renovations to existing church buildings is beyond intrusive and discriminatory. This type of law would inhibit growth, development and care of our religious space. Our worship space is essential to who we are as a church, but our community room and event spaces provide just as much value to formation, community building and services for the community. We cannot be infringed on what we do with our property.
2. Who gets to decide what accessory use is? What is to say that the church doesn't deem an event or ministry as essential and accessory. This is a clear violation of church and state when the state gets to dictate what is essential for church life.

Tom Traxler

1780 Scheffer Ave.

St. Paul, MN 55116

Sent: Thursday, October 28, 2021 9:41 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

Dear Mr. Dermody,

I am writing to you to express my concern with the overreaching proposed change in the zoning laws by the St. Paul Planning Commission and City of St. Paul. The continued assault on religious and personal freedoms in this country must cease.

The prohibition on any future development or renovations to existing church buildings is beyond intrusive and discriminatory. This type of law would inhibit growth, development and care of all religious institutions in the city. All worship space is essential to a church, but community rooms and event spaces provide just as much value to formation, community building and services for the community. Religious organizations cannot be infringed on what they do with their property.

Who gets to decide what accessory use is? A random government employee? Who may have no religious beliefs? Who may have no concept of the value of a new space within a religious organization's walls? These are not decisions that should be made for us as free law abiding, tax paying (your salary) citizens. What is to say that the church doesn't deem an event or ministry as essential and accessory. This zoning change is a clear violation of church and state when the state gets to dictate what is essential for church life.

In addition, citizens deserve to be present at these proceedings. The Saint Paul Planning Commission and the City of St. Paul leaders cannot continue to hide behind COVID. Open hearings to see real people and real faces so you remember your decisions affect real life freedoms.

Colleen Traxler
1780 Scheffer Ave
St Paul, MN 55116

Sent: Wednesday, October 27, 2021 3:47 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

Dear Mr. Dermody,

I am writing with regard to the Religious Accessory Uses Zoning Study. As a former St. Paul resident who still frequents the City as a church parishioner, I am concerned about the proposed Zoning Code amendments.

Our church facilities accommodate not only our duty to worship but the tangible expression of our religion through works of charity. We provide social gatherings for the elderly, educational opportunities for children and adults, food resources for the hungry, and countless other services that tend to the spiritual and corporal needs of those in our jurisdiction. Our churches and religious institutions are indispensable vessels of aid, serving the immense needs of local families and individuals who would otherwise rely on the city, county, or state for abetment.

Imposing these building limitations would oppress our Constitutional rights to freely exercise our religion by placing undue burden on religious institutions working tirelessly to meet community needs without taxing the resources of local municipalities. On behalf of our city and our local religious institutions, please uphold our religious freedoms without inhibiting our ability to meet this community's growing and changing needs.

Thank you kindly for your consideration. Know of my prayers for the Planning Commission as you review and deliberate upon this proposal.

Best regards,

Ms. K. Anderson

Ulysses St

Blaine, MN 55434

Sent: Thursday, October 28, 2021 6:51 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Eugénie de Rosier

Dear Bill Dermody,

I've just read about the religious zoning study that is being proposed by the city that will affect all religious institutions inside its borders. This is not a good idea. Any religious community is much more than worship and education. People's lives are closely bound to their church, synagogue, mosque, or other building where they gather for community because of belief.

This zoning would radically change how places of worship and gathering work. Churches, et al, try to bring people together to practice faith and faith happens beyond a ceremony or classroom learning. Programs are too vital to these groups to saddle them with requesting an activities' permit for every unrelated event outside of a service or classroom learning for children.

The study is overreaching and the city must not do this to we who pay your salary.

Thank you.

Eugénie de Rosier

705 Mount Hope Ave.

St. Paul, MN 55107

Sent: Friday, October 29, 2021 12:52 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Permit Requirement for Non-Religious Activities at Houses of Worship

>> Mr Dermody,

>>

>> I have read that there is a proposal under consideration that would require a permit for every activity at a church, temple or synagogue that is not directly related to worship. This would mean that many community activities regularly held at houses of worship all over the city would all become more difficult to organize. These activities are important to the social and cultural life of the community, and include such things as musical performances, scouting, all manner of training and educational programs, meetings related to volunteer and charitable endeavors, programs for seniors, and many others that are routine, beneficial and present no issues of public safety. I exclude, of course, events at which alcoholic beverages may be served, and for which I assume permits are already required.

This proposal is an ill-conceived idea. It's government overreach that serves no meaningful public purpose, and, if adopted, would likely result in broad public opposition.

Eric Bentley

1655 Eleanor Avenue

Saint Paul

Sent: Friday, October 29, 2021 1:40 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed St. Paul zoning changes for religious institutions

Mr. Dermody:

I am writing in reference to the proposed zoning-code amendments related to the manner in which religious institutions use their building spaces.

Can you please explain the motivation behind these proposed changes? What problem are the amendments addressing?

As I understand it, the proposed changes would mean 1) the city would no longer grant or authorize permits to religious institutions wanting to add on or renovate facilities used for anything other than

worship or K-8 education and 2) religious institutions would have to obtain a permit to offer any other programming not directly related to religious formation.

The practical effect of the proposed changes to zoning law, whatever their intent, is a prohibition on attendees of religious institutions living out their faith. Religious practice doesn't just entail going to a service and to school, as the proposed changes would imply. Many of the ways religious institutions use their spaces are meant to build connection and strengthen community, as well as meet various physical, social and emotional needs of congregants and neighbors, in addition to their spiritual needs. The activities and programs offered by religious institutions to both members and non-members enhance St. Paul and make it a better place to live.

I can't imagine why the Zoning Commission would want to debilitate St. Paul's religious institutions and their ability to enliven the city. They don't just make the city more pleasant; they make it worth living here. We chose to live in our St. Paul neighborhood specifically because of the religious institution to which we belong. It has been essential to our living in St. Paul. Surely the zoning commissioners understand that freedom of religion extends farther than the four walls of a sanctuary...or do they?

I anticipate your reply. Thank you for your time.

Theresa Lauber
2191 Wellesley Ave.

Sent: Friday, October 29, 2021 5:26 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Study

It was brought to my attention this morning that a meeting is set for this morning at 8:30 am regarding the above mentioned subject. As a life time resident of St. Paul I can't express enough disbelief that you are purposing such an action. Places of worship have been and hopefully will continue to be a support the needy residences of this community. They support many low income people and their families from numerous back rounds. To stop places of worship from meeting the needs in the community will be detrimental to St Paul's residence.

Without these services, that meet the needs of the people where they are at, will cause a more negative impact on the community then positive. Please rethink this process

Thank you!

Gina Hodge

268 Robie Street West

St. Paul, MN 55107

Sent: Friday, October 29, 2021 8:32 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: Scott Wendell <SCOTT.WENDELL@gmail.com>

Subject: Religious Accessory Use public hearing - opposition

Hello Bill,

Thank you for taking the time to collect responses for this proposed text amendment to the St. Paul Zoning Code. As a planner myself and resident at 1350 E Como Blvd, St Paul, MN 55117 I am asking for the City Council not to approve the proposal for the text amendment affecting Religious Institutions for accessory uses. In zoning, to me, this seems excessive and too far, and not responsive to what the City actually wants to "prevent from happening" or "encourage" from this use. The types of accessory uses to Religious Institutions can be taken care of in the definition of the use and regulating the expansion of religious institutions for what types of accessory uses they may have does not connect.

Instead of trying to streamline application processes for churches, which I did not see anything written about that in the staff report, although it was stated as one of the reasons for this change, it is actually making it harder for churches to expand under certain circumstances and go through a long, laborious Conditional Use Permit process through the city, instead of having it be permitted and free to use the church in ways in which they need the spaces. Also, I did not see any "conditions" listed for the Conditional Use permit for expansions of greater than 1,000 sq. ft. - what are the additional conditions for that other than the use?

Again, I am in opposition of this proposed text amendment. If you have any questions, please let me know.

Thank you,
Corrin

--

Corrin Wendell, AICP

Director of Community Development & Planning, City of Little Canada

Founder and Executive Director, YEP! Youth Engagement Planning

Chair, APA Women & Planning Division

Sent: Thursday, October 28, 2021 10:44 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: zoning laws

Hello Sir,

It was brought to my attention that the council wants to reword laws.ordinances- what have you, regarding religious entities. My first thought was- WHY? It is odd to me that the council has felt a need to insert themselves into the community in such a negative way.

As far as I know- churches of all denominations, synagogues, typically work with those in need, under limited access to donations/stretched budgets. Often working under their own rules and guidelines to best serve. And has done great so far, trying never to burden anyone who sought a need.

Having an Uncle who passed unexpectedly, who had been able to lift himself out of homelessness, who had served in the United States Navy- his children had been guided by the church for his cremation and funeral service. Those helping guild are church volunteers.

Volunteers are older members, obtaining new and younger volunteers is a challenge. It is a lifelong commitment from some.

For the City Council to decide themselves to come in and police or monitor and decide only on their own for unknown reasons, uneducated reasons is an insult to all of those who have been able to help and volunteer, being good stewards. The religious community doesn't need your help on how to organize or monitor themselves. They've done a fine job so far.

As far as being able to speak at a Ciiy Council meeting is limited to only Zoom meetings or emails, and not a having a chance publicly, appears to most that your move is being done under the cloak of a pandemic. Either drop the issue(which you've been sued for) or put it on the back burner so people have the opportunity to address this in person.

Thank you

Tera Schiff

cross streets: Wheelock and Payne

Sent: Friday, October 29, 2021 8:52 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Fwd: PLEASE, please, please Take Action on this City Proposal It is CRITICAL

Good morning Mr. Dermody,

I'm writing to cast my vote against these proposed changes itemized below. I do not understand why the city would need or even want to manage these types of additional permits for religious institutions. It makes no sense. There are so many vital community programs these institutions provide. The

government does not need to babysit communities in this way. It seems like nothing but a waste of time and resources.

Respectfully,

Meredith Tessier

1692 Scheffer Ave, St Paul, MN 55116

612-916-3642

----- Forwarded message -----

From: j.schmidt@highlandcatholic.org <educate@tads.com>

Date: Wed, Oct 20, 2021 at 2:46 PM

Subject: PLEASE, please, please Take Action on this City Proposal It is CRITICAL

To: <meredith.tessier@gmail.com>

Dear Parishioner and Highland Catholic School Family,

There is a proposed change in the zoning law that will be coming before the next Zoning Commission meeting on **Friday October 29th** at 8:30 a.m. As proposed, it would have adverse effects on all religious institutions in Saint Paul. We are encouraging you to participate in this discussion. The proposed change can be found [here](#).

The proposed change would have two major effects impacting all religious institutions:

1. The first change proposes that the city no longer grant or authorize permits to religious institutions that want to build or renovate their facilities unless these renovations were directly impacting the worship space or Kindergarten-8th grade education. **That suggests that if we wanted to add more meeting rooms to our building, enhance the Gathering Area, add more pre-school classrooms or any number of other improvements, a permit would not be granted.**
2. This proposal would also require religious institutions to obtain a permit to offer any other programming which is not directly related to religious formation. Thus, our bridge group, Senior exercise classes, other social events or any form of activity that might build up the community or be of service to the wider neighborhood, would require us to get an Activities Permit for every unrelated activity.

Both of these proposed changes would restrict our parish and school ministries and therefore we strongly encourage you to express your concern about this overreach by either calling Bill Dermody, the chair of the Zoning Commission at 651-266-6565 or by emailing him at bill.dermody@ci.stpaul.mn.us.

Our parish is already tight for space and these proposed changes would limit the parish's ability to grow, especially in light of "The Bridge" expansion on Ford Parkway.

Thank you in advance for your willingness to participate. The more emails and phone calls the chair of the Zoning Commission receives, the better the chance that this proposed Zoning law would be modified. If you have connections with members of mosques, synagogues or other Christian churches in the area, we encourage you to pass along this information to them as well. These proposed changes would apply to ALL religious institutions, and not just Lumen Christi.

Please email bill.dermody@ci.stpaul.mn.us right away.

Thanks.

Fr. Paul Feela, Ryan Rehkamp and Jane Schmidt

Sent: Friday, October 29, 2021 8:52 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Restricting City Service

I am writing in support of NOT resining to restrict St Paul's city services. As. Social worker in Ramsey County I know we are in a crisis when it comes to having enough shelters, food, and other services for those in need. With today's economy we never know who will be in need and need to be increasing access to services NOT limiting them

Amy Ebbesen
2160 Iglehart Ave
St Paul, MN 55104

Sent: Friday, October 29, 2021 8:53 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>; Rebecca Maciej <rebecca.maciej@gmail.com>
Subject: No to zoning changes impacting religious institutions

Dear Mr. Dermody,

We are writing to oppose the proposed changes to zoning law in St. Paul.

We are members of Lumen Christi Catholic Community (2055 Bohland Ave., St. Paul). As a member of a religious institution in St. Paul, we have a stake in the proposed changes, which would not only affect our church but all churches, synagogues, mosques, and other places of worship in St. Paul.

The proposed changes infringe upon First Amendment Right to religion and the free exercise thereof. This freedom of religion goes beyond *worship*. The proposed changes suggest restricting religious institutions to places of worship. However, as Catholics, our practice of religion goes beyond the four walls of the church building. It means loving your neighbor as yourself. It means fighting for justice, providing charity, comforting the sick, being present with the lonely, educating people of all ages, defending human life at all stages, and many other activities. To restrict the religious institutions to activities directly related to observable worship services and Kindergarten through 8th grade education, this zoning law change would infringe on the free exercise of religion.

One of the aspects of the proposed change is that a religious institution would need to acquire an Activities Permit for every activity unrelated to worship or K-8 education would be a potential decrease in the activities that religious institutions would be able to offer. If there are many institutions requesting Activities Permits, this would delay the response time and would require

additional staff (and cost) at the city level to manage the permit requests. In addition, it would negatively impact the community. Many people come to religious institutions for a variety of reasons. With senior centers and most government agencies having been closed to the public during the pandemic, people need a place to go. Religious institutions have provided locations for AA groups, senior activities, preschools, food shelves, etc. To prevent religious institutions from providing these services, there will be more of a burden on non-profit and social service agencies and on the government to provide these services. Churches also provide those services for free, but agencies and the government providing of these services would put extra costs on the agencies and government. Is the Zoning Commission willing to spend more taxpayer money for the increased staff and the space rental to provide these services? Or, is the Zoning Commission willing to see the community suffer further during the pandemic because of these proposed changes?

In regard to the proposed changes to building and renovating religious institutions, we are also opposed. Our church is our spiritual home. The average citizen change change their home for it to best serve their purpose and needs. Would you prevent a couple who are empty-nesters from changing a bedroom that is no longer being used into a craft room? Or would you prevent someone from making a workshop in their garage? I think not. That would be a government over-reach of personal freedom over their property. Likewise, religious institutions need to grow and change their space, to address the evolving needs of their spiritual family and community.

Please oppose the proposed changes to zoning law in St. Paul. Thank you for your time and consideration.

Sincerely,

Jeff and Rebecca Maciej

1053 Keefe Street

Eagan, MN 55121

Sent: Friday, October 29, 2021 9:07 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: hhp@highlandheritageproject.org

Subject: Re: zoning changes for religious institutions

Bill Dermody,

Thank you for supplying the information about the proposed zoning changes and clarifying by-right uses. In accordance with your request, here is my address:

1716 Mississippi River Blvd. S. / St. Paul 55116 (at Cleveland Avenue)

I live two blocks from the former St. Therese Catholic Church, now St. Mary's Ethiopian Orthodox Church. I am a member of Lumen Christi Catholic Community and active in the MNHS

legacy grant-funded Highland Heritage Project (www.highlandheritageproject.org) which has documented the vital functions and contributions of various religious congregations to our Highland community.

I've copied the relevant zoning change proposals, studied them, and must confess that I am still puzzled regarding the benefit and effects of the proposed changes. Accessory uses as delineated below seem very broad and certainly limiting in a rapidly changing society facing demanding social conditions.

The requirement for a "conditional use permit" seems vague and possibly the top of a slippery slope. Who knew that a tape measure would be a necessary tool for providing humane services to community members.

On one hand, the proposed changes, if enforced, will require a great deal of vigilance, supervision, and permitting. Or they could end up being the type of provision that is only selectively enforced against activities and uses deemed "undesirable" for whatever reason. Wouldn't such situations be better served by encouraging community engagement and conversation rather than by fashioning such a broad and heavy-handed provision?

Thank you,

Jacqueline Mosio

Sent: Friday, October 29, 2021 9:21 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: zoning amendment proposal

I'm not sure what issue this proposal is directed at solving. Are churches, etc. negatively impacting residential areas by providing services? Is this a response to the church that is trying to serve the homeless with a daytime drop in center? Non worship services are part of the mission of faith communities. A blanket denial of accessory building seems like overkill. Please rethink this.

Georgia Hagerty 1560 Race St. 55102

Sent: Friday, October 29, 2021 9:39 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Public Comment on Religious Accessory Uses Zoning Study

Dear Mr. Dermody and Zoning Commission:

I am the pastor of Jehovah Lutheran Church at 1566 Thomas Avenue in St. Paul, Minnesota. On behalf of my congregation and the entire St. Paul Circuit of Church of the Lutheran Church-Missouri Synod, I strongly oppose this proposal because it broadly overreaches the necessitating causes of

writing it; because the proposal is too imprecise, lacking clear definitions of "social and community services."

My understanding is that this proposal would still blanketly limit "social and community services" uses in residential areas to 1,000 square feet. If this would only be regulation of overnight shelters, I can understand this. But I do believe that this should be made more clear.

In addition, for Abrahamic faiths (Christianity, Judaism, Islam) serving our neighbors is primary not accessory to our faiths. For observant members of these faiths, regulation defining primary aspects of our faith as accessory goes beyond the court order's concern and threatens the "free exercise of religion" guaranteed to us in the 1st Amendment of the U.S. Constitution.

I appreciate that you need to fulfill this court order and address the shelter issue, but you did go far beyond that in the first draft. Because of that, we are extremely reluctant to believe that this proposal will respect the 1st Amendment and the Religious Land Use and Institutional Persons Act.

The proposal is imprecise, broad, and unnecessarily restrictive. I urge you to withdraw this proposal and construct a new one that has greater precision and narrower focus on overnight shelters.

Respectfully yours,

Pastor Joshua Miller

--

Rev. Dr. Joshua C. Miller

Pastor

Jehovah Lutheran Church

Saint Paul, Minnesota

Sent: Friday, October 29, 2021 9:46 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject:

I hope your planning doesn't include taking away the humane services given to individuals to make their lives more liveable, especially in the poorer neighborhoods.

Why was this study made?

Adaire Lassonde

602 Humboldt Ave,
St Paul, MN 55107

Sent: Friday, October 29, 2021 9:47 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessories Act

Throughout history, all religions' missions have included caring for the sick, feeding the hungry, sheltering the homeless and persecuted, and providing a community within which their members may celebrate, mourn, recreate, and other acts of social communion. In many neighborhoods, a religious building is the only practical place available for such activities.

Residents are constantly told that the city is understaffed and underfunded. Why then not welcome help from groups with literally centuries of practice to provide these services? Charging religious institutions to perform their ordained purposes is chilling. What is the criteria for deciding which activities are allowed? What is the fee structure? Who would grant these permits? Most puzzling is why no other non-profits are included in this proposal.

Government does not have the right to tell law-abiding citizens how to practice our religion. The majority of churches rely on volunteers for maintenance, daily operations, etc; they don't have the disposable income to spend on permits, especially after being shut down the past 15 months or more. A more suspicious person than I might wonder if this is a way to limit/eliminate private schools, given the plummeting enrollment in public schools. Whatever the motivation behind this, we urge you to strike down the restrictions on our civil services.

Greg and Laurie Miller
538 Brimhall St. 55116

Sent: Friday, October 29, 2021 11:00 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Cc: Peterka Sarah <speterka@interfaithaction.org>
Subject: Comment on City Planning/Zoning - from St. Anthony Park United Church of Christ

Dear Chair Rangel Morales and Members of the Planning Commission:

Thank you for the opportunity to comment on the proposed **Religious Institution Accessory Uses Code Amendments**. Here are some thoughts and recommendations from St. Anthony Park United Church of Christ:

Religious institution accessory uses include but is not limited to the following:

"But is not limited to" Please make it clear that the list of uses is not exhaustive.

For example, our church hosts a Boy Scout Troop. Troop 17 celebrated its centennial anniversary in 2015. It is the second-oldest continuously chartered troop in Minnesota, and the oldest troop in Minnesota continuously chartered by one organization (St. Anthony Park United Church of Christ). This Troop is still meeting in the same building as when it began! Although we

expect that this relationship would be grandfathered in, we believe that the rules should support similar new relationships as well.

(4) Emergency housing and overnight shelter for up to ~~ten (10)~~ twenty five (25) people, ~~along with any minor children in their care.~~

Our church has hosted Interfaith Action's Project Home in the past. Typically we have provided up to 20 beds. We suggest a limit of 25 people because there may also be infants/toddler in cribs or on small cots.

Standards and conditions:

~~(a) — No building additions or new buildings may be constructed for the primary purpose of conducting a religious institution accessory use~~

Although our church does not have room for additional buildings or additions, this condition is not reasonable for HOWs that own more land and could put that space to use to serve the community. The sentence should be deleted.

~~(b) In residential districts, a conditional use permit is required for social and community services with more than one thousand (1,000) square feet two thousand (2,000) square feet of floor area dedicated to those uses.~~

The 1,000 square foot dividing line seems arbitrary and small. If a HOW has more space that they can use for the good of the community, why shouldn't they be able to use it? We recommend increasing this number to 2000 square feet or removing it altogether.

Thank you for your time and consideration.

Rev. Victoria Wilgocki, Pastor

Beth Magistad, Moderator

Victoria Wilgocki, Pastor

St. Anthony Park United Church of Christ
2129 Commonwealth Avenue
St Paul MN 55108

Sent: Friday, October 29, 2021 11:58 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: #CI-StPaul_Ward2 <Ward2@ci.stpaul.mn.us>

Subject: Limiting civic services

Dear Mr Dermody:

What do you expect to accomplish by limiting the services provided by religious organizations?

I am OPPOSED to such restrictions unless you can present me with a rational reason behind these considerations.

Instead of trying to prevent positive activities in St. Paul, why not figure out how to mitigate the excessive noise pollution emanating from outdoor music at Keg and Case on West 7th Street this summer? This degrades the quality of life for many city residents for miles around the venue.

Thank you.

Sincerely,

John W. Miller, Jr.

706 Lincoln Avenue

Saint Paul, MN 55105

Sent: Friday, October 29, 2021 12:30 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Restrictions on the use of religious institutions

Mr. Dermody,

am writing to express my strong opposition to restrictions being considered for the use of religious buildings. The religious buildings in St. Paul should be used more to serve the community, not less. The proposed changes would not be in the good interest of the city or the people of St. Paul.

Victoria Stewart
124 Montrose Place
St. Paul, MN 55104

Sent: Friday, October 29, 2021 1:05 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning Code amendments pertaining to the Religious Accessory Uses Zoning Study

I would like to go on record to state that I oppose the Zoning Code amendments pertaining to the Religious Accessory Uses Zoning Study.

Regards,

John Theis
1932 Juliet Ave,
St Paul, MN 55105

Sent: Wednesday, October 27, 2021 2:49 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Survey

Mr. Dermody,

I have just learned of a proposed zoning law change that will restrict religious freedom by not giving permits to religious institutions for construction renovations and by restricting program activities.

Restricting religious institutions to building or renovating and offering activities solely for religious formation denies them offering space and activities that might build up the community, or be of service to the wider neighborhood. Refusing building permits and requiring activities permits for every social event, outreach program, and so on makes it difficult or impossible for religious institutions to continue functioning in their current capacity.

We live in a land where the constitution claims that we have the freedom to worship. This freedom should continue to include being able to reach out to those less fortunate and to provide community building activities.

Please say NO to this proposed zoning law change.

Kathy Burns
Minnetonka

Sent: Friday, October 29, 2021 4:53 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Proposed Religious Institution Accessory Uses Code Amendments

Dear Bill Dermody,

I have read the proposed amendments to Section 65 Zoning Code pertaining to Religious Institution Accessory Uses, and I have great concerns about the huge infringement on religious freedom, which is guaranteed in the 1st Amendment of our US Constitution.

These amendments propose to restrict churches from building a new structure, or adding on to their current structure for the purpose of, among other things, "religious education classes, counseling, social and community services."

What is the role of the church, if not to educate people about who God is (religious education), counsel people in distress, and provide practical and loving services for the community in which we serve? In denying churches the ability to perform such services in new or remodeled buildings you are directly infringing on their right to perform their basic functions as a church body.

If passed, these rules will quickly be overturned by the courts, since they violate this the First Amendment of our US Constitution:

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

This ordinance would clearly prohibit the free exercise of religion:

- You cannot do pastoral counseling in your new building.
- Neither can you cannot provide services to your community.

And it would also abridge the freedom of speech:

- You cannot teach religious classes in your new or remodeled building.

I, along with the rest of our staff and leadership at Sojourn Campus Church, urge you most strongly to table this discussion and repeal this proposed amendment. You will be doing the people of St. Paul a grave injustice if you pass these amendments. And you will very likely end up in court explaining to a judge why you think it is okay to violate the first amendment of the United States.

Thank you for listening.

Yours Sincerely,

Keith D. Lokkesmoe

Executive Pastor

Sojourn Campus Church

310 18th Ave SE

Minneapolis, MN 55414

Home address:

Keith Lokkesmoe

14463 Monterey Ave S

Savage, MN 55378

Sent: Saturday, October 30, 2021 8:06 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Discussion of change to non religious services

Dear Mr. Dermody:

I understand the city planning commission is to discuss a measure to reduce non- religious services offered to the community by religious institutions. I strongly oppose these measures. Churches, mosques, and synagogues provide a vital role in serving the disenfranchised in our community. Please do not remove this important strength that our community is providing. I live in West Saint Paul but I work in St Paul as a Social Worker for Ramsey County Veteran Services. I work with veterans in many circumstances including homelessness. It is extremely important that there continues to be a variety smaller community based sources of help for people who are struggling in our community. Government assistance is not enough and many individuals will only accept help from non-government agencies, such as churches. Removing the ability of religious institutions to serve the community via food shelf, housing, clothing resources, and other would be a terrible mistake and would be a detriment not only to those in need but to the community at large. Homelessness, poverty, and lack if access to resources impacts all members of the community, not just those in need. These local neighborhood efforts are very much needed to serve their area and should be allowed to offer services as is needed by their corner of the community. Please don't institute a measure that would counter all the hard work that is being done. We need more services, not less.

Kristen Nord

1167 Cherokee Ave, St Paul, MN 55118

Sent: Saturday, October 30, 2021 8:22 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Zoning Study

Re: proposed Zoning Code amendments pertaining to the Religious Accessory Zoning Study.

I received the zoning law draft inviting review/response. I am concerned about the lack of clarity in the language of the proposed zoning law. Specifically the use of the term "accessory." Some of the functions listed are central to our parish mission such as worship, religious education, counseling, gathering socially as a parish community, and collecting outreach resources for the poor. There is the implication that separate conditional use permits will now be required to carry out components of our pre-existing mission which has been undertaken by our community for well over 107 years. Also confusing is the use of the word "community." It is unclear if the intent is to require obtaining permission for us to perform

our necessary functions as a parish or if they are trying to control any use of our building by others in the larger public community which we might undertake jointly in faithfulness to our mission.

John Hofstede

--

John M, Hofstede

pastor,

Church of St. Cecilia

2357 Bayless Place,

St. Paul, MN 55114

Sent: Saturday, October 30, 2021 12:09 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Opposition to proposed ordinance restricting houses of worship

Dear Mr. Dermody,

I am a resident of Saint Paul and a Lutheran pastor (retired).

I write to express opposition to the proposed ordinance restricting accommodation of "religious accessory uses," or physical spaces intended to provide community services. The proposed restrictions are too limiting and need to be reconsidered.

Thank you for hearing the many voices of religious leaders in the community who oppose it and considering my opinion as well. I hope the proposal will be withdrawn and reconsidered.

Sincerely,

Thomas Duke

711 Wheelock Parkway W

Saint Paul, MN 55117

Sent: Saturday, October 30, 2021 12:43 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Re: Proposed Religious Accessory Uses Zoning Ordinance

Dear City Planner Dermody:

Regarding the proposed Religious Accessory Uses Zoning Ordinance:

This seems like a cruel joke, coming in the midst of the pandemic, which has revealed more clearly than ever the social and economic needs of so many in our society. It is overly broad and too vague and would surely invite protracted lawsuits and neighborhood dissension. For the sake of the neediest in our society, and in the spirit of religious freedom,

I oppose this misguided amendment.

David Hedenstrom
1448 Lafond Avenue
St. Paul

Sent: Thursday, October 28, 2021 5:13 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: comment on Religious Accessory Uses zoning proposal

Dear members of the planning commission:

Planner Bill Dermody met recently with St. Paul faith leaders at a convening hosted by Interfaith Action of Greater St. Paul. I was personally unable to attend that meeting but viewed a recording of it after the fact. I greatly appreciate Bill Dermody's willingness to engage the faith community in this way.

The congregation I serve is deeply connected with Interfaith Action. We have hosted Project Home in our church building since that program's inception more than 20 years ago. Faith communities seek to love and serve our neighbors and often do so in ways that the planning commission considers "religious accessory uses." I strongly oppose any action of the planning commission that would impede the efforts of faith communities to serve our neighbors. Therefore, I join other faith leaders across the city in expressing concern about several aspects of the zoning proposal.

Interfaith Action prepared comments in response to the Religious Accessory Uses zoning proposal, which I have had an opportunity to review, and which I understand have been submitted to the planning commission. I write to wholeheartedly endorse Interfaith Action's comments and implore you as members of the planning commission to seriously consider Interfaith Action's remarks as you finalize the proposal.

Sincerely,

Pastor Javen Swanson (he/him/his)

Gloria Dei Lutheran Church
700 Snelling Ave. S.
St. Paul, MN 55116

Sent: Friday, October 29, 2021 7:10 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious accessory zoning changes

Hello Bill,

I'm writing to express my concerns about the proposed changes to permits for religious organizations and buildings. I do not support the changes, and want all religious institutions to maintain the freedom to meet the needs of their community without local government restriction and overreach.

Thank you!

Shelly C. Darnall

I'm at County B and Hamline. I have a daughter that attends St Rose of Lima school.

Sent: Thursday, October 28, 2021 10:01 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Strongly Opposed to proposed Sec. 65.919

Think Before You Click: This email originated outside our organization.

Regarding proposed Sec. 65.919. Religious institution accessory use.

Religious institution accessory uses include the following:

(1) Child and adult day care; art, music, dance, adult and general education classes; after-school programs; religious education classes.

(2) Community center, community meeting and performance space, receptions.

(3) Counseling, social and community services.

(4) Emergency housing and overnight shelter for up to ten (10) adults, along with any minor children in their care.

(5) Food shelf.

Standards and conditions:

(a) No building additions or new buildings may be constructed for the primary purpose of conducting a religious institution accessory use.

(b) In residential districts, a conditional use permit is required for social and community services with more than one thousand (1,000) square feet of floor area dedicated to those uses.

(c) These standards and conditions shall not be applied in a manner that restricts rights to religious exercise as granted under the Religious Land Use and Institutionalized Persons Act or other laws.

I am opposed to requiring religious institutions to obtain a conditional use permit prior to offering the use of their facilities in "residential districts" for any of the listed activities (1) -(5), all of which are inherently religious uses rather than "accessory."

It is basic religious practice to provide relief to burdened caregivers; to celebrate with music, dancing, poetry, art and food; to teach and to learn; to gather together in fellowship, worship and healing; to counsel; to feed and to shelter the poor; and to otherwise meet the needs of the community.

I am opposed to the city of Saint Paul undertaking to define what is inherently religious and what is "accessory." It would be far preferable to eliminate "residential districts" where any of these listed activities might ever be restricted. The city should focus instead on managing any nuisance behavior that arises following these activities rather than pre-censoring them or charging fees to allow them.

The only provision of this proposed ordinance that does not unconstitutionally infringe on the free exercise of religion is (c). While (a) might be reasonable under some circumstances, (b) should be deleted in its entirety. St. Paul has an abundance of beautiful, historic religious buildings that should be used more, not less.

Jean Schroefer,

on behalf of all of the churches I've ever attended or lived close to, but in particular now, the Virginia Street Church at 170 Virginia Street

My comment was on behalf of the Virginia Street Church at 170 Virginia Street, Saint Paul.

I am secretary-treasurer of the 501c3 nonprofit, Friends of the Historic Virginia Street Church, at 170 Virginia Street, Saint Paul.

I previously volunteered at Dayton Avenue Presbyterian Church at 217 Mackubin, which closed. They hosted beautiful public events, as well as a clothing center for the poor.

I was serving on the Summit-University Planning Council when Shiloh Baptist on Victoria Avenue was demolished and replaced with a garish day care center. (I appreciate well-crafted historic buildings.)

I have enjoyed many beautiful, free and open to the public, concerts at the Saint Paul Cathedral.

I lived at 271 Summit Avenue, Saint Paul for 14 years, until the end of 2019, and at 1640 Bohland Ave. for 19 years, until 1995. I provided housing in Saint Paul that was affordable to families who received welfare checks and to families with Section 8 vouchers, from 1981 through 2018.

My current home address:

W8520 162nd Ave.

Hager City, WI 54014

Jean Schroefer

Sent: Saturday, October 30, 2021 5:04 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning changes

Dear Mr Dermody.

I want to let you know about my disappointment with the proposed zoning changes in St Paul. A church is so much more to a community than a mass and a school. Churches can serve as a center of activity—public speakers, peer group meetings, and even serve as a voting site for the community at large. To create zoning that restricts the churches' ability to meet their parish needs is short sighted at a time when we need more community, not less

Thank you for your consideration
Bethany Hoffman
782 Syndicate St S
St Paul, MN 55116

Sent: Sunday, October 31, 2021 5:01 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious accessory uses

These proposed provisions make no sense at all, especially during the pandemic downsides we are still experiencing. It seems as though you don't want to help people at all. I am opposed to these provisions.

Sincerely,

Karon Schmitt

1910 Graham Ave #122

St. Paul, MN 55116 -2681

Sent: Saturday, October 30, 2021 11:13 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: zoning proposal

Any proposal placing a burden on churches that provide assistance to people in need seems counter intuitive to me. Most of these church based programs receive no tax revenue and are funded by members or grants from other non profit organizations. This should be seen by the general population of the city as decreasing the tax burden they might otherwise incur . The proposal seems very poorly written and therefore likely written in haste with limited time to respond.

Who could possibly want this to happen?

Janet Quarn

Dale and Larpenteur are my cross streets. My church is in the Midway.

Sent: Thursday, October 28, 2021 11:52 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Zoning Law for Religious Accessory Uses

To Whom It May Concern,

As a senior citizen, I am very concerned about the potential unintended negative impacts the proposed zoning law may have on the future ability and flexibility of my parish at Lumen Christi Catholic Community of Highland Park to serve its community. Please be mindful that a modern church is no longer just a place of worship or religious education. In today's environment, a church has increasingly faced the same challenges and callings in dealing with societal issues, such as mental health, environment, social justice, etc. A church therefore needs to be able to adjust in a nimble fashion in its operation going forward. Thank you for your understanding.

Sincerely,

Joe Chan

425 County Road C West,

Roseville, MN 55113

A parishioner at Lumen Christi Catholic Community

Sent: Friday, October 29, 2021 10:49 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Fwd: Churches

This is to voice my opinion on not putting any religious restrictions on our churches.

State or government cannot do that on our freedom of worship places. Please never vote for such an issue!!

Mary Kay and Allen Rudeen

1250 Belmont Ln W, Roseville

Members of a Catholic Church

Sent: Monday, November 1, 2021 10:10 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed changes re "Religious Accessory Uses Zoning"

I am writing in opposition to what I am understanding re the Religious Accessory Uses Zoning study and the proposed change that will directly impact religious impact religious institutions.

First of all, religious institutions serve and are based in community. Why limit what serves community buiding and contributions made to the life of community members?.

Secondly, beyond that foundational concern, I am concerned with how this proposed this proposed change serves any legitimate government purpose. Some of my concerns are the difficulty of interpreting what constitutes "directly related to religious formation", "directly impacting worship space OR K-8 grad education", etc.

Additionally, what costs/penalties/'fines might be assessed, not to mention expenses associated with potential lawsuits for infringement on religious grounds? And in that vein, what expenses are associated with monitoring and enforcing permitted versus unpermitted "improvements" to facilities of religious institutions. What constitutes "a religious institution"?

I see nothing to be gained and much to be lost in pursuing the proposed changes and no legitimate government interest in doing so. I am interested in learning more about why this change has ben proposed and would appreciate any insight that your offices can provide. If the criteria are basically financial considerations, who wins and who looses is a question I raise and how is the taxpayer affected by these changes.

Mary F. Sutherland

740 - Mississippi River Blvd So.

St. Paul, MN 55116

Sent: Monday, November 1, 2021 11:55 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>; Goodman, Nicolle (CI-StPaul) <Nicolle.Goodman@ci.stpaul.mn.us>

Subject: Religious Accessory Uses Zoning Study

Greetings,

My name is John Marboe, and I am pastor of Zion Lutheran Church in the Midway, at the corner of Lafond and Aldine.

I wish to offer comment on the proposed Religious Accessory Uses ordinance, at this stage of the study.

As written, I view this ordinance is highly problematic, and I oppose it as it stands.

1. As a minister and theologian, I find the way in which it conceives "accessory uses," implying they are not primary or core, to be misguided. Religious education is primary. Feeding the hungry is primary. Serving the poor is primary. Fostering healthy communities is primary. A community that 'worships' without engaging in these things is not is not worshipping in deed. I suggest the category of "accessory use" needs to be dismissed.

2. The issue of "primary use" would be problematic for my parish, and is ambiguous. We have a fellowship hall. It is 3000 sf. It is used almost entirely for "accessory uses": A weekly free meal and groceries for people in need in the community. Community meetings. Receptions. Quilting. Art programs. Exercise classes. These we have done for decades.

The idea that we must now obtain a (or several?) permit for such uses would be burdensome for us and for the city. Especially if each program would require it.

3. With regard to new construction, part "a" is unduly prohibitive. I cannot believe the Planning Commission would want to forbid a parish from adding ample space for religious education, receptions, community services such as Block Nurse or children's programs, meals, and the like. 1000sf is terribly small, even for my small parish.

(note: I just saw that part "a" is proposed to be struck. I leave this comment in case the issue is revisited.)

4. The limit of 10 adults plus children for overnight shelter is much too small. Project Home (of St. Paul Interfaith Action) would become terribly limited in how it currently houses families using space and volunteers in congregations in residential areas, for a month at a time.

This is unduly restrictive.

5. Religious institutions (nor anyone) should not be allowed to engage in programing and building uses that damages the common welfare of, nor violates the reasonable expectations of, residents and neighbors.

Yet the proposed ordinance as written restricts the ability of religious institutions to do things that actually enhance neighborhoods and communities and make for a more livable city.

I therefore urge the Commission to revise this process with the necessary input to create an ordinance that enacts our mutual values.

Final note: The striking of part "a", while salutary, does not adequately address the concerns stated above.

Respectfully,

Rev. John Marboe

Sent: Monday, November 1, 2021 4:15 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Public comment re: Religious Institution Accessory Uses Code Amendments

City of St. Paul Planning Commission

c/o Bill Dermody

15 Kellogg Blvd. West

Saint Paul, MN 55102

Dear Mr. Dermody and To Whom It May Concern,

Please accept the following statement for the public record in response to the proposed Religious Institution Accessory Uses Code Amendments:

On behalf of the 1,700+ households of registered parishioners at Nativity of Our Lord in St. Paul's Mac-Groveland neighborhood, I am writing to express my grave concern with and firm opposition to the proposed Religious Institution Accessory Uses Code Amendments by the city of St. Paul and its Department Of Planning & Economic Development.

Nativity of Our Lord, in addition to its religious patrimony, has been a cultural, civic, and social pillar of the St. Paul community for the past 99 years. Our church's efforts to help care for the poor, infirm, and vulnerable members of our community — Catholic and non-Catholic alike — include regular food and clothing collections, blood drives, and fundraisers benefiting the homeless, single mothers, and disaster victims, to name just a few. The proposed amendments imperil these efforts which are indistinguishable from our Christian vocation, as are our educational endeavors and social programming. Our parish was founded with a school building first, as has been the custom for generations, and the proposed amendments threaten this foundational part of our mission and our 850 schoolchildren and their families. This includes our Early Learning Center, which remained open throughout the pandemic, providing daycare services to essential workers.

Religious education, spiritual counseling, wedding and funeral receptions, et al. are in no way *accessory* to the mission of Nativity of Our Lord or any of the 26 other Catholic churches in St. Paul, nor should they be subject to unnecessary or ambiguous government restriction or regulation, whether they apply to current buildings or new construction. The proposed amendments as written already restrict rights to religious exercise as granted by God and protected by law, and jeopardize our ability to

serve our thousands of parishioners and neighbors alike, now and in the future. As both Christians and citizens of St. Paul, we reject them outright, and we implore our civic leaders and neighbors to oppose their adoption.

Fr. Patrick Hipwell, Pastor of Nativity of Our Lord

324 Prior Ave. S.
St Paul, MN 55105

Please let me know if you have any questions.

Kind regards,

Isaac Huss // Director of Communications & Marketing



Sent: Monday, November 1, 2021 10:00 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses

Mr. Dermody-

I am a St. Paul resident and am writing to express concern about the proposed changes to our city's zoning laws.

As you know, residents in our cities have many needs and faith communities have stepped in to address many of them. They house much-needed child care centers. They offer meals, support groups, food shelves, free clinics, trainings for volunteers and much more. Our city should be making it easier for religious institutions to fill these needs - instead you are proposing changes that would make this more difficult.

Churches, synagogues and mosques meet these needs because they are called to work for the common good. Our city and its residents are kept safe by building codes, setback requirements, inspections and other means. This proposed changes won't improve our city or the quality of life for our residents. Instead, they will limit opportunity and options. Please reject these proposed changes.

Anne Krisnik

139 Exeter Place

Sent: Sunday, October 31, 2021 3:36 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Zoning Code Amendment

Mr. Dermody,

While we not longer reside in St. Paul, we attend Zion Lutheran Church located in the Midway area of St. Paul. We have attended the church for about five years. At the time we joined Zion, it had around 15 attendees at the weekly worship service, and was a church that was near the point of closure. Now the church's weekly attendance is around 30 - 40 weekly, including those who "attend" via Zoom. Some of those who attend via Zoom are from outside the Midwest, including Colorado, Texas and New Jersey. What has turned the church around? The strong leadership of Pastor John Marboe who has continued and introduced community-oriented programs that have engaged members.

One of the community programs is the weekly (every Thursday) food program. This program has been in place at Zion for years and years. Anyone is welcome to attend lunch provided by the church and also take home a bagful of groceries. Some (but not all) of those who appear at the church for food on Thursdays are homeless. Some of those whom the church have helped with food are now attending church services at Zion - perhaps not every Sunday but on a somewhat regular basis. A remarkable program that has started recently at Zion is providing space and a kitchen for a new company that makes pancake and other mixes. The program is remarkable because the employees are recruited from the homeless community and all proceeds benefit the homeless community. While the company is in its infant stages, it has already resulted in one homeless person no longer on the streets. I invite you to learn more about the program at prevailnews.org. The name of the company is Prevail and its products are currently available at one community cooperative with hopes that the products will soon be at Mississippi Market. Another program that is located at Zion and created since Pastor Marboe assumed his position as pastor is Arts on Lafond. Arts on Lafond is a program to encourage local artists by providing publication, organization and space for concerts, recitals and other programs. Sometimes admission is charged and sometimes it is not. While Arts on Lafond does not have its own website you can learn more about the program by googling Arts on Lafond. Finally, Zion has been experimenting with making community connections by hosting outside theater productions and by encouraging community organizations to think about utilizing space and talent at Zion Lutheran. The church has found success in these types of initiatives and (at least until your proposed ordinance) intended to continue to build community through whatever creative, meaningful and productive endeavors might come along.

"Church" is no longer just about hoping people walk in the door for a Sunday service and come back. It is also not about "evangelizing" and trying to get people to commit to religious faith. Church is about building community. Zion's community (whether they attend Sunday services or not) includes the homeless, those with homes who are food insecure, local artists whether they are struggling with their careers or not, theater attendees who may not otherwise step inside a church, the local neighborhood who might notice a program or experience that interests them, and anyone in St. Paul or elsewhere who cares about not just being a community of faith but also a community open to a variety of points of view and individuals who come together to acknowledge what we have in common.

I am very concerned about the ordinance you and your staff have written which appears to limit the very programs that have energized the Zion community. It is vaguely worded and seems to suggest that churches must limit themselves to religious outreach. It also appears from comments you have made that the ordinance has been hastily put together without regard to its consequences. I urge you to reconsider what may be a well-intentioned but is definitely ill-advised interference with the faith communities that exist in St. Paul.

Marlin O. Osthus
1125 Kingsley Circle South
Mendota Heights, MN 55118

(Until 2018 - 1203 Scheffer Avenue, St. Paul, MN 55116)

Sent: Thursday, October 28, 2021 7:46 PM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: Religious Accessory Uses Zoning Law

To :
Bill Dermody

Please vote against this Religious Zoning Law This proposed zoning law looks to do more harm than good.

The city needs to take a deeper look at the many programs the Religious communities provide the people of St. Paul and how this could impact the people that use them.

Making it harder to offer programs by asking for permits or not granting permits for certain renovations does not sound like the St. Paul I have lived in for the past 63 years.

Just remember, that it is very easy for people to move to other cities that will not have this kind of Big Brother dictatorship.

John Kaufenberg
cross streets: Howell and Edgcumbe Rd

Sent: Friday, October 29, 2021 8:18 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: New Zoning laws for religious institutions

Good Morning Mr. Dermody,

I am disappointed to here about the proposed zoning law changes that would cripple all religious organizations in the city of St.Paul.

These organizations are part of the backbones of our communities. They service all backgrounds of people and offer a safe environment for prayer, growth and involvement.

Changing the zoning laws creates undo costs and delays for these community pillars to improve their physical spaces to meet the changing needs of their community and continue to offer increasing services.

I ask you to think about the actual reason for this proposed change and consider the wider impact on all of St. Paul, not just one neighbor.

This impact good be disastrous for our city.

Thank you for your time.

Sincerely,

Julie C. Keegstra
4589 Blaine Ave. Inver Grove Heights, MN 55076

Sent: Monday, October 25, 2021 9:51 AM

To: #CI-StPaul_Ward2 <Ward2@ci.stpaul.mn.us>; Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Religious Accessory Uses Zoning Study

To: City of St. Paul Councilmember Noecker and City of St. Paul City Planner Bill Demody,

With disturbing suddenness I have learned:

There are proposed changes in the zoning law that will be coming before the next Zoning Commission on Friday, October 29 at 8:30 AM. The proposed changes would have two major effects impacting all religious institutions in St. Paul.

1. The City of St. Paul would no longer grant or authorize permits to religious institutions that want to build or renovate their facilities unless these renovations were directly impacting the worship space or Kindergarten-8th grade education. That suggests that if religious organizations wanted to add more meeting rooms, enhance the Gathering Area, add more preschool classrooms or any number of other improvements, a permit would not be granted.
2. These proposals would require religious institutions to obtain a permit to offer any other programming which is not directly related to religious formation. Thus, a Bridge group, senior exercise classes, other social events or any other activity that might build up the local religious community or be of service to the wider local neighborhood, would require the religious organization to get an Activities Permit for every unrelated activity.

Both of these proposed changes would restrict parish and school ministries.

I CONSIDER THE ABOVE PROPOSALS TO BE GOVERNMENT OVERREACH! THE PROPOSALS DIRECTLY VIOLATE THE SEPARATION OF CITY/STATE AND RELIGION IN CITY AND RELIGIOUS COMMUNITIES. And consequently, the adoption of these proposals would be a failure of the City government to stay out of religious organizations and would be against the law. Furthermore, these proposed zoning changes will detract from supporting the many ongoing future benefits that religious organizations continue to bring to the City of St. Paul and its citizens.

In any case, please respond to me via email. And, if anything I have presented in the above is not correct, certainly please respond.

Thank you for your understanding in this matter!

John Traxler

344 Robert Street South, St. Paul, MN 55107

Business Owner in the City of Saint Paul, and

Member of Lumen Christi Catholic Church community in the City of Saint Paul

Sent: Saturday, October 30, 2021 10:46 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Fwd: Pending restriction of Civic Services

The information about this is beyond what I understand. To make a particular point, does this legislation say Food Shelves will not be permitted in a separate building from a church is not permitted? If so, this is terrible - what purpose does it serve?

Nancy Larkey

2414 Chilcombe Avenue, St Paul 55108

Sent: Thursday, October 28, 2021 10:44 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Zoning law changes, 10/29 mtg.

Regarding a proposed change in the zoning law that restricts community programming within a place of worship , please vote NO. Likewise a restriction on expansion of facilities and building for religious facilities appears to be targeted and prejudicial .

Please vote NO.

We've worked to eliminate targeting and bias in recent years. Please do not simply change the focus and continue a misguided practice.

Thank you

Mary McClure

1021 Ashland Ave

St. Paul 55104
