

SAINT PAUL PLANNING COMMISSION
NOTICE OF PUBLIC HEARING
Congregate Living Zoning Study

The Saint Paul Planning Commission will hold a public hearing on the Congregate Living Zoning Study. The proposed code amendments and Planning Commission questions for the public begin on the 2nd page of this notice. More information is posted at <https://www.stpaul.gov/departments/planning-economic-development/planning/current-activities>

The Planning Commission will hold the public hearing on:
Friday October 17, 2025 at 8:30 a.m.
Room 40 City Hall (Basement)
15 West Kellogg Boulevard, Saint Paul, MN 55102

All comments concerning the zoning study and proposed zoning code text amendments will be heard at the public hearing. Comments submitted in writing should be addressed to:

Saint Paul Planning Commission
c/o Bill Dermody
1400 City Hall Annex
25 West Fourth Street
Saint Paul, MN 55102

Or to Bill Dermody at Bill.Dermody@stpaul.gov. For written testimony to be included in the official public record you must include your name and address.

Call Bill Dermody at 651-266-6617 with any questions.

Planning Commission's Questions for the Public

The Planning Commission would particularly appreciate feedback from the public on the following questions regarding the draft zoning code amendments, which start on the next page.

1. **How many adult residents should be permitted in a sober house? Why?**
“Sober houses” are a form of sober living group homes that are not staffed, have no on-site services, are financially self-supporting, and are not regulated by the state. They provide a non-institutional residential environment with rules and regulations intended to encourage and sustain the residents’ recovery from chemical dependency. There is currently no upper limit to the number of sober house residents in most zoning districts in St. Paul. We desire to set a reasonable limit that allows the facility to function like a family.
2. **How far should sober houses be separated from each other? Why?** The current minimum separation distance is 330 feet.
3. **How far should supportive housing facilities, emergency housing, shelters for battered persons, and certain other congregate living facilities be separated from each other? Why?** These types of facilities provide on-site services to residents and are generally staffed. The current minimum separation distance is 1,320 feet in most of the city (outside of downtown). We are considering distances between 300 feet (a short block) to 1,000 feet. We are also considering having a shorter distance if there is an arterial street in between the facilities.
4. **Will these definitions make it easier for facility operators to know which category of congregate living they fall under in St. Paul?** There has been confusion over whether certain facilities fall under “sober houses” or “supportive housing” in our code. We want to make it clearer going forward.

Draft Amendments: Congregate Living Zoning Study

Proposed deletions in ~~strikeout~~ and additions in underline.

Sec. 60.110. Reasonable accommodation.

The city has a legitimate interest in preserving the character of residential neighborhoods by adopting regulations relating to the number and type of structures and uses, the number of persons who may occupy a dwelling or structure, and ~~off-street parking~~ other land use regulations, in order to control population density, noise, disturbance and traffic congestion. However, these regulations shall not be applied so as to prevent the city from making reasonable accommodation as required by the Federal Fair Housing Act Amendments of 1988. Reasonable accommodation means providing flexibility in the application of zoning regulations to afford an individual with a disability equal use and enjoyment of a dwelling or structure.

Sec. 65.152. Community residential facility, licensed correctional.

One (1) main building, or portion thereof, on one (1) zoning lot where one (1) or more persons who are placed there by a court, court services department, parole authority or other correctional agency having dispositional power over persons charged with or convicted of a crime or adjudicated delinquent reside under the care and supervision of a residential program licensed by the state department of corrections.

This definition does not include:

- (1) Licensed foster care homes serving persons under eighteen (18) years of age in the principal residence of the license holder;
- (2) Municipal, county or regional jails, workhouses, juvenile detention facilities, or state correctional facilities operated by the commissioner of corrections.

Standards and conditions:

- (a) Preliminary licensing review by the state department of corrections.
- (b) The facility must be a minimum distance of ~~one thousand three hundred twenty (1,320)~~ six hundred (600) feet from any other of the following congregate living facilities with more than six (6) adult residents, ~~except in B4-B5 business districts where it must be at least six hundred (600) feet from any other such facility unless the facilities are separated by an arterial street, in which case the minimum separation distance is three hundred (300) feet~~: supportive housing facility, licensed correctional community residential facility, emergency housing facility, shelter for battered persons, or overnight shelter.
- (c) The facility serves no more than sixteen (16) facility residents, except in B4-B5 business districts where it must serve no more than thirty-two (32) facility residents.
- (d) It must occupy the entire structure.

- (e) In T2-T4 traditional neighborhood districts, the density is regulated as for multifamily uses.

Sec. 65.160. Shelter for battered persons.

One (1) main building, or portion thereof, on one (1) zoning lot where adults and children who have suffered assault or battery live on a 24-hour-per-day basis for a period of time generally not to exceed thirty (30) days ~~and are served by a program certified by the state department of corrections.~~

Standards and conditions for shelters for battered persons serving more than six (6) adult facility residents and minor children in their care:

- (a) In RL-H2 residential, T1 traditional neighborhood, F1-F2 Ford and OS-~~B2~~ BC business districts, a conditional use permit is required for facilities serving more than six (6) adult facility residents and minor children in their care.
- (b) The facility must be a minimum distance of ~~one thousand three hundred twenty (1,320)~~ six hundred (600) feet from any other of the following congregate living facilities with more than six (6) adult residents unless the facilities are separated by an arterial street, in which case the minimum separation distance is three hundred (300) feet: shelter for battered persons, supportive housing facility, licensed correctional community residential facility, emergency housing facility, or overnight shelter.
- (c) In RL-H2 residential, T1 traditional neighborhood, F1-F2 Ford, OS-~~B3~~ B1 business and IT-I2 industrial districts, the facility must serve sixteen (16) or fewer adult facility residents and minor children in their care.
- (d) The facility must not be located in a two-family or multifamily dwelling unless it occupies the entire structure.
- (e) In T2-~~T4~~ traditional neighborhood districts, the density is regulated as for multifamily uses.

Sec. 65.161. Sober house, financially self-supporting.

A dwelling unit occupied by more than six (6) persons, all of whom (except potentially an on-site manager) are in recovery from chemical dependency and considered handicapped under the Federal Fair Housing Act Amendments of 1988, that provides a non-institutional residential environment in which the residents willingly subject themselves to written rules and conditions, including prohibition of alcohol and drug use (except for prescription medications obtained and used under medical supervision), intended to encourage and sustain their recovery. The residents of a sober house are similar to a family unit, and share kitchen and bathroom facilities and other common areas of the unit. Sober houses are financially self-supporting. This definition does not include facilities that receive operating revenue from governmental sources. Sober houses do not provide on-site supportive services to residents,

including the following: mental health services; clinical rehabilitation services; social services; medical, dental, ~~nutritional~~ and other health care services; financial management services; legal services; vocational services; and other similar supportive services.

Standards and conditions:

~~A request for reasonable accommodation for this use as required under the Federal Fair Housing Act Amendments of 1988 by providing an exception to the maximum number of unrelated persons living together in a dwelling unit shall automatically be granted if the following standards and conditions are met. This does not limit the city from granting additional reasonable accommodation for this use under the general provisions of this Code.~~

- (a) The operator must submit a ~~request for reasonable accommodation~~ sober house registration to the zoning administrator on a form provided by the city, specify the number of residents, and provide information necessary to assure the use meets applicable zoning standards. ~~The maximum total number of residents permitted in the sober house is specified by the fire certificate of occupancy.~~
- (b) ~~In RL H1 Residential Districts, the~~ The sober house must serve ten (10) or fewer residents.
- ~~(c) For a structure serving seventeen (17) or more sober house residents, a conditional use permit is required. This use is exempt from section 61.501 conditional use permit general standards (a), (c), and (d).~~
- ~~(c)~~ A building containing one (1) or more sober house units must be a minimum distance of three hundred thirty (330) feet from any other building containing a sober house.

Sec. 65.162. Supportive housing facility.

One (1) main building, or portion thereof, on one (1) zoning lot where persons with mental illness, chemical dependency, physical or mental handicaps, and/or persons who have experienced homelessness reside and wherein counseling, training, support groups, and/or similar services are provided to the residents. This definition includes sober homes (recovery residences) as defined by Minnesota Revised Statutes 245B that receive operating revenue from governmental sources.

This definition does not include:

- (1) Foster homes as defined in this Code;
- (2) Residential treatment programs physically located on hospital grounds;
- (3) Regional treatment centers operated by the commissioner of human services;
- (4) Licensed semi-independent living services for persons with mental retardation or related conditions or mental illness, if the license holder is not providing, in any manner, direct or indirect, the housing used by persons receiving the service.
- (5) Community residential facilities, licensed correctional, as defined in this Code.

Standards and conditions:

- (a) The facility must be a minimum distance of ~~one thousand three hundred twenty (1,320)~~ six hundred sixty (600) feet from any other of the following congregate living facilities with more than six (6) adult residents, ~~except in B4-B5 business districts where it must be at least six hundred (600) feet from any other such facility unless the facilities are separated by an arterial street, in which case the minimum separation distance is three hundred (300) feet~~: supportive housing facility, licensed correctional community residential facility, emergency housing facility, shelter for battered persons, or overnight shelter.
- (b) In RL-H2 residential, T1 traditional neighborhood, Ford, OS-B3 business and IT-I2 industrial districts, the facility must serve sixteen (16) or fewer facility residents.
- (c) In RM1-RM3 residential, T1 traditional neighborhood and F1 Ford districts, a conditional use permit is required for facilities serving more than sixteen (16) facility residents.
- (d) In T2-T4 traditional neighborhood districts, the density is regulated as for multifamily uses.

Sec. 66.221. Residential district use table.

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

Table 66.221. Residential District Uses

Use	RL	H1	H2	RM1	RM2	RM3	Definition (d) Standards (s)
Residential Uses							
<i>Congregate Living</i>							
Shelter for battered persons	P/C	P/C	P/C	P/C	P/C	P/C	(d), (s)
Sober house	P	P	P/C	P/C	P/C	P/C	(d), (s)

Sec. 66.321. Traditional neighborhood district use table.

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

Table 66.321. Traditional Neighborhood District Uses

Use	T1	T2	T3	T4	Definition (d) Standards (s)
Residential Uses					
<i>Congregate Living</i>					
Shelter for battered persons	P/C	P/C	P/C	P/C	(d), (s)
Sober house	P/C	P/C	P/C	P/C	(d), (s)

Sec. 66.421. Business district use table.

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

Table 66.421. Business District Uses

Use	OS	B1	BC	B2	B3	B4	B5	Definition (d) Standards (s)
Residential Uses								
<i>Congregate Living</i>								
Shelter for battered persons	P/C	P/C	P/C	P/€	P	P	P	(d), (s)
Sober house	P/€	P/€	P/€	P/€	P/€	P/€	P/€	(d), (s)

Sec. 66.521. Industrial district use table.

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

Table 66.521. Industrial District Uses

Use	IT	I1	I2	I3	Definition (d) Standards (s)
Residential Uses					
<i>Congregate Living</i>					
Sober house	P/€	P/€	P/€		(d), (s)

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>							
Shelter for battered persons	P/C	P/C	P/€	P/€	P/€		(d), (s)
Sober house	P/€	P/€	P/€	P/€	P/€		(d), (s)