



**CITY OF SAINT PAUL**  
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DATE: July 2, 2020  
TO: Comprehensive & Neighborhood Planning Committee  
FROM: Bill Dermody, City Planner  
RE: Additional RM Zoning Study options

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Staff offers the following (non-exhaustive) options for CNPC consideration that reflect issues raised at the June 24 meeting. It is hoped that this memo will aid the CNPC's discussion and recommendation. Potential new code language is in [blue](#).

### **1. Affordable Housing Bonus**

A main impetus for the RM Zoning Study is to increase supply of housing units as a means to address the affordable housing crisis. The existing staff recommendation accomplishes that, on the whole. However, there's also a desire to encourage relief from the tight supply of housing units at all affordability levels and not just at the higher income levels first, as unguided market forces might be inclined to do.

Inclusionary zoning, i.e. minimum requirements for affordable housing in developments of a certain size, is under study by staff and will require a thorough understanding of the residential market to ensure it will be both effective for creating affordable units and not excessively deterring of development activity. The Inclusionary Zoning Study is on hold and not anticipated to fully restart until 2021. However, in the meantime, the CNPC may wish to consider affordable housing bonuses (rather than requirements) to incentivize affordable housing in the RM zoning districts.

In the bonus approach, the lower rent revenues that come from the affordable housing units are essentially made up by revenue received from market rate units. Conveniently, the affordable housing units should be easier to fund in the areas they're needed most – where the market rents are highest.

A new Footnote N that provides an affordable housing bonus could be created to apply to maximum FAR in the RM1, RM2, and RM3 districts:

[\(n\) The FAR maximum with structured parking may be increased by 0.5 if at least 10% of new dwelling units are affordable at 60% of the Area Median Income for at least 15 years. The FAR maximum](#)

with structured parking may be increased by an additional 0.5 (total of 1.0 increase) if at least 20% of new dwelling units are affordable at 60% of the Area Median Income for at least 15 years. Units required to be affordable shall be occupied by qualifying low-income residents. Prior to receiving a certificate of occupancy for the new building (or building expansion), demonstration of the commitment to affordable housing in accordance with this footnote must be provided as: a deed restriction or other contractual agreement with the city, or a city housing and redevelopment authority financing agreement or other similar financing agreement, and documentation of low-income residents' qualifications.

Paired with that, the maximum FAR with structured parking could be reduced, especially in the RM3 district and perhaps the RM2 district, to improve the chances that the affordable housing bonus would be used. However, it is important to not reduce the base FAR maximums to the extent they would unduly suppress multifamily development and further exacerbate the affordability crisis.

<u>Zoning District</u>	<u>Floor Area Ratio (FAR)</u>	<u>Building Height Maximum</u>	<u>Yard Setbacks Minimum (feet)</u>		
	<u>Maximum (e)</u>	<u>Feet</u>	<u>Front</u>	<u>Side</u>	<u>Rear</u>
<u>RM1 multiple-family (a)</u>	<u>0.6 FAR with surface parking</u> <u>1.0 FAR with structured parking (n)</u>	<u>35 (i)</u>	<u>25 (f)</u>	<u>9 (h)</u> <u>(m)</u>	<u>25</u>
<u>RM2 multiple-family (a)</u>	<u>1.5 FAR with surface parking</u> <u>2-52.25 FAR with structured parking (n)</u>	<u>35 (j) (m)</u>	<u>25 (f)</u>	<u>9 (h)</u> <u>(k)</u>	<u>9 (k)</u>
<u>RM3 multiple-family</u>	<u>1.5 FAR with surface parking</u> <u>4-9 3.5 FAR with structured parking (n)</u>	<u>no maximum</u>	<u>25 (f)</u>	<u>9 (h)</u> <u>(k)</u>	<u>9 (k)</u>

**2. Increase the Maximum Height for Narrow Mid-Block Lots**

Change the base maximum height for RM1 to 40' and for RM2 to 40' or 45'.

<u>Zoning District</u>	<u>Floor Area Ratio (FAR)</u>	<u>Building Height Maximum</u>	<u>Yard Setbacks Minimum (feet)</u>		
	<u>Maximum (e)</u>	<u>Feet</u>	<u>Front</u>	<u>Side</u>	<u>Rear</u>
<u>RM1 multiple-family (a)</u>	<u>0.6 FAR with surface parking</u> <u>1.0 FAR with structured parking</u>	<u>3540 (i)</u>	<u>25 (f)</u>	<u>9 (h)</u> <u>(m)</u>	<u>25</u>

<u>RM2 multiple-family (a)</u>	<u>1.5 FAR with surface parking</u> <u>2.5 FAR with structured parking</u>	<u>3540 (j) (m)</u>	<u>25 (f)</u>	<u>9 (h) (k)</u>	<u>9 (k)</u>
<u>RM3 multiple-family</u>	<u>1.5 FAR with surface parking</u> <u>4.0 FAR with structured parking</u>	<u>no maximum</u>	<u>25 (f)</u>	<u>9 (h) (k)</u>	<u>9 (k)</u>

**3. Make RM1 Height Consistent Across the Board**

Delete footnote “i” and just set RM1’s maximum height at 40’ (per above) or 45’. No CUP option and no differentiation for narrower vs. wider lots and corner vs. mid-block locations. It would have the benefit of simplification.

~~(i) On lots more than sixty (60) feet wide and on corner lots, building height may exceed thirty-five (35) feet, to a maximum of forty (40) feet. Additionally, a maximum height of forty-five (45) feet may be permitted on such lots with a conditional use permit.~~

**4. Restrict the Provision for Smaller Side Yard Setbacks on Narrow Lots to Only Shorter Buildings**

Depending on what is done with height, the CNPC may wish to reword footnote “h” referring to smaller side yard setbacks in RM1 and RM2 districts to ensure it applies only to shorter buildings. Part of the rationale for smaller side yard setbacks on narrow lots remains: that it is difficult to construct a functional multi-family building in a 22’-wide building envelope (40’ standard lot width minus 18’ of side yard setbacks). But, without this change, part of the rationale could be lost if the maximum heights on narrow mid-block lots are increased: that smaller side yard setbacks are more acceptable when the buildings are shorter.

~~(h) Side yards are required only for dwelling units on the ends of townhouse structures. When two (2) or more one-family, two-family, or townhouse structures are constructed on a single parcel, there shall be a distance of at least twelve (12) feet between principal buildings. When two (2) or more multifamily buildings are constructed on a single parcel, there shall be a distance of at least eighteen (18) feet between principal buildings. For two-family and multifamily dwellings in RM1 and RM2 districts on lots of sixty (60) feet width or narrower, the minimum side yard setback is reduced to six (6) feet for buildings of thirty-five (35) feet height or less. The side yard setback requirement from interior lot lines may be reduced or waived when an easement or common wall agreement, certified by the City building official for conformance with the state building code, is recorded on the deeds of the adjoining parcels.~~

**Attachment**

1. PowerPoint presentation (FAR examples)