



**CITY OF SAINT PAUL**  
*Melvin Carter, Mayor*

*25 West Fourth Street  
Saint Paul, MN 55102*

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**DATE:** July 17, 2020  
**TO:** Comprehensive and Neighborhood Planning Committee  
**FROM:** Mike Richardson, City Planner  
**SUBJECT:** Districts 14 and 15 Residential Design Standards Amendments – Post-public hearing

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### **Purpose**

The purpose of this memo is to update the Comprehensive and Neighborhood Planning Committee (CNPC) on the public comments received during the hearing held on May 29, 2020 related to residential design standards in Districts 14 and 15 adopted in 2015 and update recommendations to amend the Zoning Code in response to those comments.

### **Background**

On September 2, 2015, amendments to the zoning code went into effect that modified some residential dimensional and design standards in Districts 14 and 15. They were intended to address a trend of house teardown and reconstruction that led to homes that:

- pushed the boundaries of what dimensional standards allowed
- were perceived to be out of character with the existing housing stock
- created negative visual and light access impacts for neighboring properties due to long, tall, and unbroken building facades.

In general, the standards have been successful. However, two elements have emerged as problematic in their implementation – sidewall articulation and height.

Please see the memo dated February 14, 2020 for full background and analysis. It can be found under the May 29, 2020 meeting on the Planning Commission website:

<https://www.stpaul.gov/departments/planning-economic-development/planning/planning-commission>.

## Public Hearing

A public hearing was held at the May 29, 2020 meeting of the Planning Commission. There were three letters received, one from each of the District Councils and one from a resident.

The Macalester-Groveland Community Council (District 14) supported the amendments as outlined in the February 14 memo.

The Highland District Council (District 15) supported the amendments with the exception of the proposed exemption from the reduced height requirement for projects that expand by less than 50 percent.

The resident emphasized the importance of maintaining the intent of the original standards.

There was no public comment on the proposed amendment to allow the Zoning Administrator to make a determination of adequate articulation based on “significant wall projection, depression, or roofline variation.” Per the February memo, it was included for discussion but the Department of Safety and Inspections had expressed reservations prior to its release and have repeated concern since. Additional discussion below.

## Discussion

### *Exemption from Reduced Height Requirement*

Highland District Council (HDC) expressed concern that the expansion exemption allowing the standard 30' height limit was too lenient and significantly eroded the intent of the standards. The primary issue was that long and tall additions could be built along property lines or within nonconforming setbacks that would fall within the suggested 50% floor area expansion trigger. For example, a house with a 1,200 square foot building footprint could build up to a 600 square foot addition split between two floors and not be subject to reduced height limits. Each of the new floors could be about 17' x 17' if built square and there would be no reduced height limit per the current language. The effect could be the addition of a 17' long addition along the property line with a wall height around 30' (see Figure 1). If the addition was not square and stretched along the property line, the impact would be even greater.

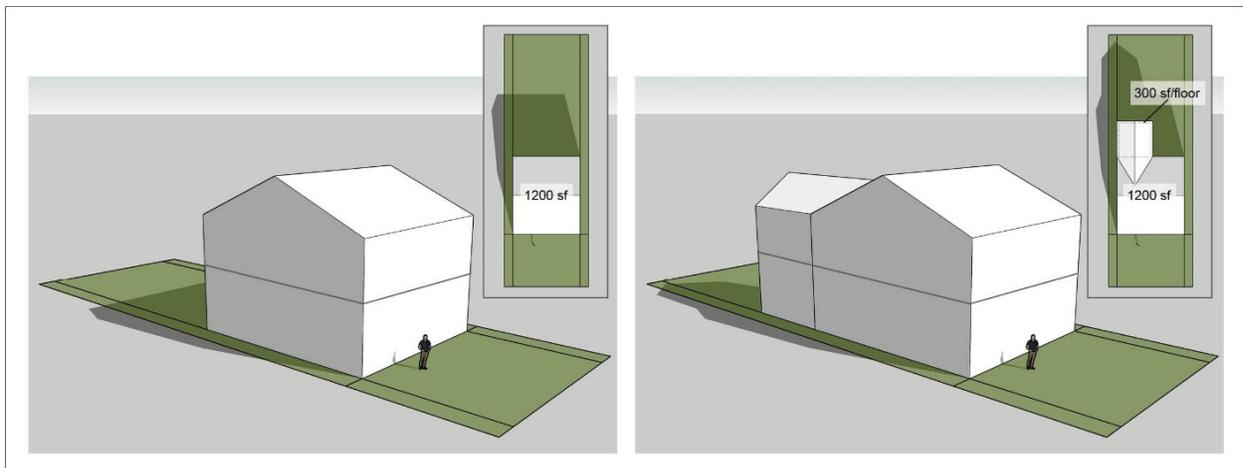


Figure 1 - Example of Potential Expansion under Public Hearing Draft Language (dimensions approximate)

This suggestion is sensible and addresses one of the goals for this study, which is to maintain the intent of the original standards. For clarity, the proposed language specifies that additions, in addition to new construction, must also meet the reduced height requirement. There remains a proposed 2' increase of allowed height at side setback lines (22' current, 24' proposed) for houses in the R4 zoning district to account for construction challenges related to truss height.

#### *Zoning Administrator Determination*

The language released for public review included language allowing case-by-case analysis by the Zoning Administrator for projects that didn't meet the strict standards or the code, but still had elements that could meet the intent. DSI was reluctant to support that amendment, but it was included to see if public review or comment revealed anything that might inform the decision. No public comment was received related to that specific language and DSI has repeated their concern about subjectivity, documentation, and risk of inconsistency in the application process. Due to these concerns, the language is removed for this draft.

#### *Issues with Current Language*

As noted in the February memo, there were a number of issues to be addressed with this study and associated amendments. The discussion below outlines how the proposed amendments address each.

1. *Height and articulation requirements don't effectively account for reuse of all or part of a building.*

There are three changes that address challenges with reuse. The first is limiting the projects to which the articulation requirements applies to those that have more than a modest expansion. Second is to redefine the vertical element of what constitutes articulation by replacing the grade to eave requirement with a minimum one-story height beginning at or below the first floor. This significantly reduces challenges associated with reusing foundations. Third, any construction that maintains the same footprint would be exempt from the articulation requirement for the same reason. Note that the reduced height requirement would apply as defined in note(l) for table 66.231.

2. *Reduced height limits don't account for modern truss systems, especially when building near required side setback lines.*

An expansion of the maximum height at required side setback lines from 22' to 24' in the R4 zoning district accounts for the additional height needed for truss systems.

3. *The District Councils and Board of Zoning Appeals (BZA) consistently find that some elements of design (i.e. roofline variation and chimneys) meet the intent of the 2015 standards, but don't meet the strict articulation requirements in the code.*

This issue is addressed by redefining what constitutes articulation as discussed in item number one. However, while there are cases where elements such as roofline and chimneys have a significant impact on breaking up a building, each design varies so much that it is difficult to generalize elements that will do enough to ensure that they meet the original intent. The proposal to have the Zoning Administrator review those elements was a potential way forward to allow more flexibility in what would be considered articulation. However, based on the discussion outlined earlier, that option is not recommended. The proposed language is a compromise to allow more flexibility for articulation as clearly defined in the code, but will still require some continued case-by-case review by the BZA when those standards are not met.

### **Recommendations**

Staff recommends that the Committee forward this memo, the February 14, 2020 memo, and updated draft text amendments to the Planning Commission for consideration and recommendation of approval to the Mayor and City Council.

### **Attachments**

Attachment A: Draft Text Amendment Language (with markups)

Attachment B: Draft Text Amendment Language (clean)

Attachment C: Public Comments

cc: Zoning Administrator

Ward 3 Office

Ward 4 Office

District 14

District 15

Attachment A

Draft Language for Districts 14 & 15 Residential Standards (marked up)

7/22/20 CNPC Meeting

## Sec. 66.231. - Density and dimensional standards table.

Table 66.231, residential district dimensional standards, sets forth density and dimensional standards that are specific to residential districts. These standards are in addition to the provisions of chapter 63, regulations of general applicability.

Table 66.231. Residential District Dimensional Standards

Zoning District	Lot Size Minimum (per unit)		Height Maximum		Yard Setbacks Minimum (feet)		
	Area (sq. ft.)(b)	Width (feet)	Stories	Feet	Front	Side	Rear
R1 one-family	9,600 (e)	80	3	30 (l)	30 (g)	10	25
R2 one-family	7,200	60	3	30 (l)	25 (g)	8 (h)	25
R3 one-family	6,000	50	3	30 (l)	25 (g)	6 (h)	25
R4 one-family	5,000	40	3	30 (l)	25 (g)	4 (h)	25

Notes to table 66.231, residential district dimensional standards:

(a)...(k)...

- (l) For principal residential structures in planning districts 14 and 15, For new construction and including additions that increase the floor area by more than 50% of the existing building footprint R1—R4 residential districts in planning districts 14 and 15, excluding property with local heritage preservation site or district designation, shall have the following maximum building heights shall apply at required side setback lines: 28 feet in R1, 26 feet in R2, 24 feet in R3, and 22 feet in and R4. One (1) foot shall be added to the maximum building height per each one (1) foot the portion of the building is set back from the nearest required side setback line, to a the maximum height of thirty-five (35) feet allowed in the district. Building height for flat roofs shall be measured to the highest point of the parapet, if present. Properties with local heritage preservation site or district designation are excluded from the requirements of this note.

## Sec. 66.234. - Sidewall articulation.

For For principal residential structures in R1—R4 residential districts in planning districts 14 and 15, excluding property with local heritage preservation site or district designation, sidewall articulation is required for building faces that exceed thirty-five (35) feet in length for new residential construction and additions that increase the floor area by more than 50% of the existing building footprint. Articulation shall be in the form of a structural projection of at least one (1) foot in depth and six (6) feet in length, and must extend from grade to the eave at least one story tall starting at or below the first floor elevation. Alternatively, the requirement can be met by a significant wall projection, depression, or roofline variation, subject to approval by the zoning administrator. New construction and additions that maintain the

same footprint and property with local heritage preservation site or district designation are exempt from this requirement.

Attachment B

Draft Language for Districts 14 & 15 Residential Standards (clean)

7/22/20 CNPC Meeting

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Notes to table 66.231, residential district dimensional standards:

(a)...(k)...

- (l) For principal residential structures in planning districts 14 and 15, new construction including additions shall have the following maximum building heights at required side setback lines: 28 feet in R1, 26 feet in R2, 24 feet in R3 and R4. One (1) foot shall be added to the maximum building height per each one (1) foot the portion of the building is set back from the nearest required side setback line, to the maximum height allowed in the district. Building height for flat roofs shall be measured to the highest point of the parapet, if present. Properties with local heritage preservation site or district designation are excluded from the requirements of this note.

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Attachment C

Public Comment for Districts 14 & 15 Residential Design Standards

7/22/20 CNPC Meeting



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

651-695-4000  
mgcc@macgrove.org

May 27, 2020

Mike Richardson  
City Planner  
Planning & Economic Development  
25 W. 4th St., Suite 1300  
Saint Paul, MN 55102

Dear Mike,

On April 14, 2020, the Board of Directors of the Macalester-Groveland Community Council (“MGCC”) held a public meeting, at which it considered a recommendation from its standing Housing and Land Use Committee.

After discussion, the Board of the MGCC passed the following resolution as recommended by the Housing and Land Use Committee of the MGCC:

*“The Housing and Land Use Committee of the Macalester-Groveland Community Council supports the amendments to the District 14 and 15 Residential Design Standards as outlined in the memo from City Planner Mike Richardson to the Comprehensive and Neighborhood Planning Committee of the City of Saint Paul, dated February 14, 2020.”*

The Macalester-Groveland Community Council would also like to express their appreciation and thanks for all of the time you have spent reviewing previous housing projects and gaining neighborhood feedback and the excellent work done to draft amendments to the residential design standards.

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

Alexa Golemo  
Executive Director  
Macalester-Groveland Community Council

cc (via email): Councilmember Chris Tolbert, Ward 3  
Councilmember Mitra Jalali, Ward 4



## Resolution to Support the Ward 3 Design Standards Code Update

WHEREAS, the Saint Paul City Council requested a study of the Residential Design Standards in August of 2014 and the Planning and Economic Development approved a study of Ward 3 residential Design Standards; and

WHEREAS, the Highland District Council (HDC) discussed this issue at the Community Development Committee (CDC) meetings on May 20, 2014 and August 19th, 2014 and held Community input meetings with City Planner, Mike Richardson, on October 13, 2014, January 20, 2015 and March 18, 2015; and

WHEREAS, the HDC passed a resolution of support for these changes on May 1, 2015; and

WHEREAS, on October 18, 2018 the HDC requested that the Planning and Economic Development Department of the City of Saint Paul, review and finalize the Ward 3 Residential Design Standards in 2019; and

WHEREAS, The Development Committee of the HDC met with PED Staff on November 19, 2019 and February 18, 2020 to review the draft Zoning Code changes;

WHEREAS, the revised zoning language will address the changes adopted in 2015 to address the high number of granted variance requests for height and sidewall articulation, while maintaining the intent of the 2015 amendment; and

WHEREAS, the Committee suggested dropping the exemption for projects that expand by less than 50% from the height requirement, to prevent additions on a 4 foot side yard setback that could go up to 30 feet; therefore

BE IT RESOLVED, that the Community Development Committee of the Highland District Council recommends approval of the revised zoning language without the exemption for projects that expand by less than 50% from the height requirement.

Approved March 18, 2020

By the Community Development Committee of the Highland District Council

## residential design standards

STEVEN ENGLISH <engl1630@isd194.org>

Tue 5/26/2020 5:56 PM

To: Richardson, Mike (CI-StPaul) <mike.richardson@ci.stpaul.mn.us>

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

Dear Mike, Thank you for your service to our city. I want to urge you to please find a way to maintain the intent of the design standards for District 14 and District 15. Thank you for listening. Take Care.

From, Steve English  
1596 Saunders Ave  
Saint Paul, MN 55116  
H 651 690 1090

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Steve English  
Lakeview Elementary  
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