

From:	Robert Wales <rawales@gmail.com>
Sent on:	Friday, February 21, 2020 3:10:15 PM
To:	Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject:	RM Zoning Study Comments

Good morning -

I'd like to make the following recommendations and comments on the RM Zoning Study Code Amendments.

FAR versus max units

First and foremost I believe the transition to FAR would be a great benefit not only to maximize density potential but also as a standardization across our zoning codes. Removing unit maximums and transitioning to FAR would make for better land use and standards in the code.

The bonus for 3+ units should also be included as well as bonuses for RM2 common areas that would allow for variances for height maximums so that common area doesn't become a penalty to unit density (see below).

Setbacks, Maximum lot size coverage, and heights

In order to maximize land use and to bring RM more inline with T zoning standards, I'd like to see the front and rear setbacks reduced to 10ft which should also increase maximum lot coverage from the current 35%. The maximum lot coverage should be adjusted to be in line with T standards.

Especially in RM2 this would allow for increasing units.

Additionally, I would like to see the height maximum increased in RM2 specifically so that taller multi-unit (4-6) can be accommodated.

Moreover, the footnote regulating the maximum dwelling units on lots less than 9,000 sq ft should be removed. With FAR as the deciding factor, it is irrelevant and antiquated.

Thank you for your consideration of these comments.

Robert Wales
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From:	Jamie Stopestad <jamie@yardhomesmn.com>
Sent on:	Tuesday, March 3, 2020 7:35:48 PM
To:	Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
CC:	Privratsky, Matt (CI-StPaul) <Matt.Privratsky@ci.stpaul.mn.us>; Pereira, Luis (CI-StPaul) <Luis.Pereira@ci.stpaul.mn.us>
Subject:	St. Paul zoning text amendments
Attachments:	RM Zoning Study PH 4-17-20 ENS Notice.pdf (233.8 KB)

Bill,

I'm writing to share some feedback to the proposed text amendments:

1. Section 66.230. Residential District Density and Dimensional Standards.

- The building height limits in the code seem arbitrary and inappropriate based on current construction technologies and spacial standards. As you know, many buildings built before the mid 1980's had 8'4" or 8'6" finished ceilings and used dimensional lumber for floor joists. In the current era, the standard for interior finished ceiling height has increased to 9' and the industry has migrated almost entirely to (taller) web truss systems. In addition, building codes now require limiting sound transmission between floor-ceiling assemblies, which in practice have increased the depth of these assemblies. The result of these changes has not been captured in zoning codes, and I'd argue it's time for St. Paul's code to reflect this in the Building Height Maximum tables throughout. I think it's reasonable to assume a minimum of 11' floor-to-floor, or better yet 12'. This would make a 3-story structure 33 to 36' tall instead of 30' tall.

- Another reason to increase the floor-to-floor height assumptions is to facilitate the migration to off-site modular construction technologies. There is significant momentum around this shift in construction (more at www.crs Summitmn.com) and this has significant implications on building heights. Full volumetric modular units are 6-sided structural frames and these are stacked on top of each other to form a multi-story modular building. So, instead of a single combined floor-ceiling assembly modular construction results in a floor assembly and a separate ceiling assembly, and in practice adds another horizontal element to the building. If St. Paul wants to foster the adoption of off-site modular construction technologies, then a 12' floor-to-floor height is more appropriate, or again a 36' maximum height for a 3-story building.

- In my view the current height standards reduce practical building height and thus density, in contrast to the overall policy objectives under the comprehensive plan.

2. Section 66.231. Footnote (b)

- I strongly recommend against eliminating this footnote because this would have the impact of downzoning nearly every residential lot in St. Paul, since nearly every such lot adjoins an alley. I suppose the other course of action could be to increase every FAR figure and minimum lot size to compensate for

the reduced lot dimension provided by this footnote. It's hard to understate how significant this proposed change is.

- A key impact of eliminating this provision would be to drastically reduce the number of lots where ADU's are permitted. I don't think this is consistent with stated public policy or your intent.

3. Section 66.231. Footnote (l).

- This seems a proposed new standard and seems arbitrary and mis-aligned with prevailing construction technology and fire codes. The fire code sets 75' as the key height for buildings subject to high-rise code. I'd recommend you therefore use 75' instead of 70' as the relevant maximum height. Do do otherwise, again in light of prevailing construction technologies, would result in effectively one less floor on many larger apartment buildings, which does not seem aligned with the overall goals of the comprehensive plan and city policies.

4. Section 66.232. Maximum Lot Coverage.

- I would strongly recommend an increase in the maximum lot coverage to something greater than 35% for the principal buildings, and at least 50% for all buildings on a lot. The reason for this is primarily to comport with the overall density objectives under the comp plan and particularly related to ADU's. The current zoning codes imposes a number of barriers to the expansion of ADU's in St. Paul, and the current 40% total lot coverage maximum is one of the most significant barriers.

- The limits on lot coverage, especially in residential districts, places significant limitations on the ways the city can adapt to demographic change and growth. Many people I talk with are concerned about the increasing scale of multi-family structures and prefer "gentle density" by increasing the scale of dwellings more subtly and across a wider geography. I think the recent adoption of St. Paul's ADU ordinance city-wide deserves complementary changes to allow ADU's to be built in practice.

Thanks for considering this feedback. Happy to discuss further.

Jamie

https://content.govdelivery.com/attachments/STPAUL/2020/03/03/file_attachments/1391399/RM%20Zoning%20Study%20PH%204-17-20%20ENS%20Notice.pdf

Jamie Stolpestad
Partner, YardHomes MN
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Bill Dermody, City Planner

March 10, 2020

Dear Bill,

Thank you for your presentation of St. Paul's RM Zoning Study at the Macalester Groveland Community Council's (MGCC) Housing and Land Use Committee (HLU) Meeting on February 26, 2020. I'm grateful to the Comprehensive & Neighborhood Planning Committees for their work to create the density our City needs. I appreciate your invitation for citizen comments. I write as a resident of Macalester Groveland, not as a representative of any organization.

I believe that this RM Zoning Study is tainted by the statement on Page 40, "*the proposed code amendments do not address this Grand Avenue-specific footnote and would leave it in-force.*" regarding "*A footnote to the RM2 dimensional standards provides additional regulation for a 0.7-mile stretch of Grand Avenue from Fairview to Cretin that contains a lot of RM2 zoning and is near the University of St. Thomas.*"

I live at 2038 Summit Avenue. A significant segment of this "*0.7 mile stretch*" is my back yard. Our two-block alley, bounded by a liquor store and a gas station, is alive with diverse neighbors. I **know** my neighbors. I coordinate the Alley Plowing for our Prior/Cleveland stretch. A neighbor from the Fairview/Prior block does the plowing. I've driven alleys up and down Grand Avenue looking for solutions to an ice problem we had on our block. I **know** Grand Avenue, front and back. I can't help but wonder if this "*additional regulation*" comes from a few loud voices West of Cleveland who are sincere in their belief that they know what's best for our neighborhood. I feel disconcerted about what some might think differentiates us from the rest of Grand Avenue.

At the June 3, 2019 Board of Zoning Appeals (BZA) Meeting about a variance for 2150 Grand Avenue, Board Member Danielle Swift had the courage to recognize "discrimination" and "NIMBY" in the opposition to the variance. Board Member Swift did that without knowing that the neighbors on the West Summit Neighborhood Advisory Committee (WSNAC) have a "Neighborhood Stabilization Fund" to give significant sums of money to entice people, including a member of WSNAC, to "convert" student rental property by putting restrictive covenants on deeds to prevent them from renting to students. Ms. Swift wasn't present at a University of St. Thomas (UST) meeting with Student Leaders and neighbors after a racial slur incident on campus. There, a well-meaning neighbor asked a student of color, "Do you feel welcome in our neighborhood?". The Student Leader paused, "Ma'am, no student feels welcome in your neighborhood." I'm a witness to what BZA Member Swift recognized as discrimination and NIMBY. I've been nullified by, "Students aren't a protected class."

I'm entering my seventh year of service on MGCC. I represented MGCC on WSNAC for six years until I resigned October 2019. Our neighborhood's housing market will be impacted when UST's 570 new on-campus beds will be available September 2020. St. Paul's RM Zoning Study

is a timely opportunity for our community to shift from the “War Years” mentality. I invite you to ask: What truly differentiates our “0.7 mile stretch” West of Fairview from all of Grand Avenue? What criteria was used to exclude us from the zoning changes recommended for the whole City of St. Paul?

I believe St. Paul’s 2040 Comprehensive Plan is a beacon of hope for our city. The RM Zoning Study provides opportunities for change to meet our density goals. If “*This includes a lower height maximum (40’ instead of 50’), a requirement to comply with the T2 design standards, and a special minimum lot size for units with three or more bedrooms.*” is, as you said at the HLU meeting, left “*in-force*”, Macalester-Groveland is denied the opportunity to fully participate in St. Paul’s 2040 Comprehensive Plan.

I **know** that our “0.7 mile stretch” is a good place to live. I **know** my neighbors. I’m not the only one who wants all neighbors to feel welcome here. I ask the Comprehensive & Neighborhood Planning Committees to remove the “*additional regulation for a 0.7-mile stretch of Grand Avenue from Fairview to Cretin*” from the RM Zoning Study to allow Macalester-Groveland to fully participate in the St. Paul’s 2040 Comprehensive Plan.

Zoning that perpetuates discrimination: **Not In My Back Yard!**

Sincerely,

Cathy Plessner
2038 Summit Avenue
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From: Jeremy Exley <jeremy.exley@gmail.com>
Sent: Tuesday, April 7, 2020 8:04 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: RM Study Feedback

Planning Commission C/O Bill Dermody,

Comments on RM2 proposed changes.

Setbacks - Sideyard:

I would like to see more relief for side yard setbacks to allow for wider more structurally sound buildings. Especially in scenarios where there are apartments on each side of a lot. Maybe a caveat where if the adjoining properties are not residential use the side yard setback can be reduced? Some houses currently have a setback of 3-4 feet.

Setbacks overall:

I would look more to the T2 setbacks which will allow for higher density.

Max Lot Coverage:

For RM1,2 and 3 I see the max lot coverage went away, however, with front and back setbacks of 25 feet and side of 9 on a single lot the max building size is 36%, so only 1% larger than the previous maximum. Lot size of 40 x 150.

Height:

Note K (1) for Grand Ave Property limiting 40 feet in height compared to note L allowing 70 feet in height. Grand Avenue is a major artery and as such should have large high density buildings. Limiting the height to 40 feet will limit the amount of density allowed. This was a reaction to the building built at 2124 Grand Avenue in 2013 that was 5 stories. If we are now thinking of increasing the height allowance up to 70 feet with a CUP does that Grand Avenue note still make sense? Allowing bigger buildings on Grand and in other RM2 locations will help get rentals out of the more traditional neighborhood homes which will have a positive impact on the neighborhoods and values while keeping students closer to campus or on major arteries.

Is there an option to move any of the properties to T2 or spot changes any of them where development makes sense? Specifically properties that have been left out of recent developments and now are

limited in what they can do. 2132 Grand Avenue is a good example where a developer acquired the properties on either side and left a 2 story home on a single lot between a 5 story and 4 story building.

Thanks,

Jeremy Exley

Owner of 2132 Grand



North End Neighborhood Organization (District 6)
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April 13, 2020

Bill Dermody
City Planner
Planning & Economic Development
25 W. 4th St., 14th Floor
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The North End Neighborhood Organization's Board of Directors met with you regarding the RM Zoning Study on Monday April 6, 2020. The city of Saint Paul like most urban areas are experiencing a shortage of housing. The intent of the RM2 medium density multiple family residential district is to support pedestrian and transit orientated residential development and provide for infill housing to meet a variety of housing needs.

In reviewing the proposed changes and after hearing your presentation the North End Neighborhood organization supports the modification and changes to the RM2 zoning code.

We want to thank-you for meeting remotely with us and appreciate the Planning and Economic Development department including neighborhood organizations in your process and seeking our opinion regarding changes, projects and plans

Regards:

Karin Groening
Board Chair

Cc: Ward 1
Ward 5

Hello Planning Commission,

I'd like to pass on feedback regarding the preservation of the lot setback requirements for RM zones.

I currently own 3 multifamily buildings in St. Paul, and I've had tenants ask me in the past few years if I had any smaller apartments they'd be able to move into since costs have been quickly rising.

After the 2040 plan was passed, I began exploring different options to reduce rent for individual tenants in each of these 3 buildings by adding new units so that building costs can be shared.

While most of the barriers to helping lower rent through zoning are addressed in the RM zoning student, the lot setback requirements can still make any exterior changes difficult.

I would like to see the front, back, and side yard setbacks reduced for all structures so that more housing can be provided. If this isn't feasible, I would be curious as to whether an exception could be added for stairways, porches or decks so that rather than use up valuable interior space (if even possible in the building), a stairway on the exterior can provide access to apartments. In most cases, I imagine a stairway is not going to be taking up the entire side yard of a building. Perhaps in most instances, a compact, multilevel stairway wouldn't need more than 12 or so feet in width, including landings.

Here's a more concrete suggestion for RM zones if it's helpful:

Front/Back yard setback: 10-15ft

(25ft for RM zones seems very restrictive. On many of the lots to be re-zoned to RM in the future, I imagine the setbacks will create a barrier to providing additional housing)

AND

Option 1:

Side yard setbacks: 4ft

OR

Option 2 (if 4ft seems too close for a building):

Side yard setback (building structure): 6ft

Side yard setback (decks, porches, stairways): 3ft

(A 3ft difference between the building and stairway setback would allow for a lot to be efficiently used should the owner wish to run a (narrow) stairway alongside their new addition. Most lot owners would probably wish for the stairway to be at least 4ft wide, however.)

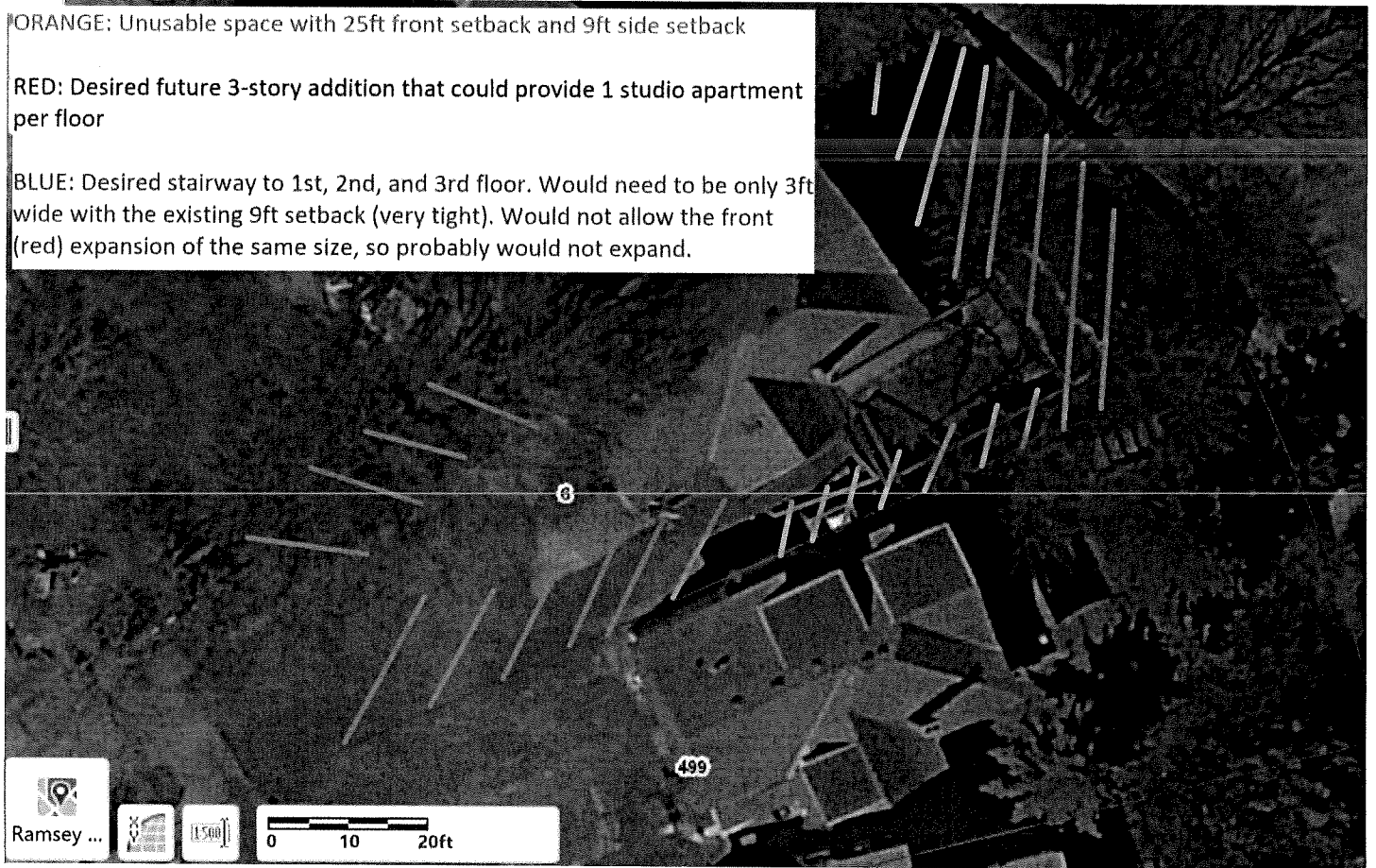
Example 1: Existing building with RM2 zoning, just off the Fairview Green line station.

6 Oakley Avenue

ORANGE: Unusable space with 25ft front setback and 9ft side setback

RED: Desired future 3-story addition that could provide 1 studio apartment per floor

BLUE: Desired stairway to 1st, 2nd, and 3rd floor. Would need to be only 3ft wide with the existing 9ft setback (very tight). Would not allow the front (red) expansion of the same size, so probably would not expand.

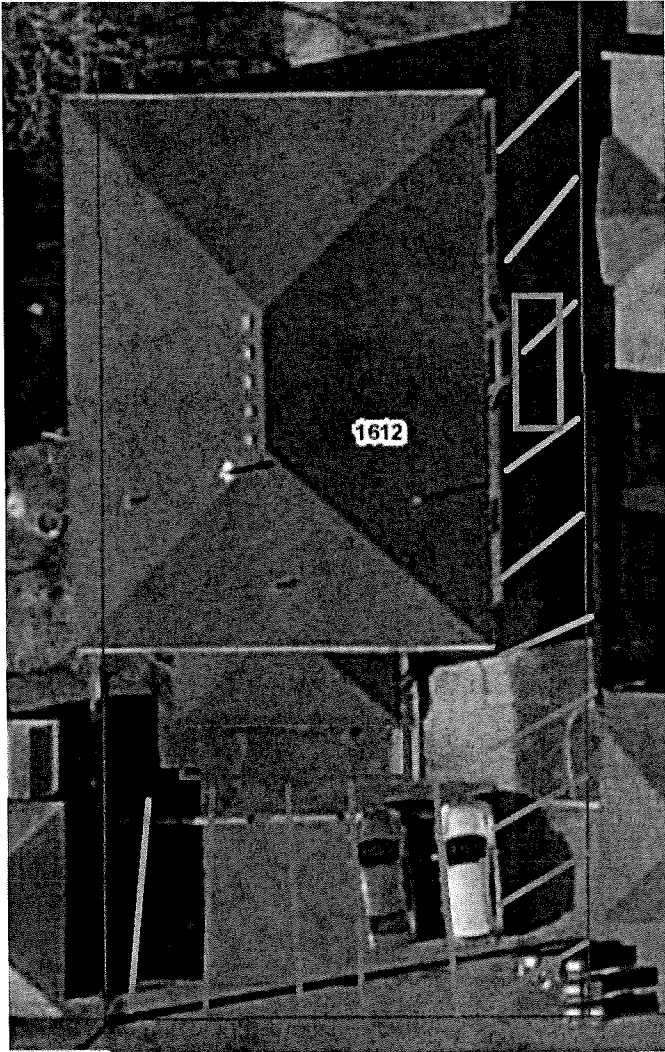


I was hoping to be able to use some of my front and side yard to expand the building to provide more housing. A reduced front setback would more easily allow me to add a 2nd and 3rd floor deck off the front of the apartments that overlook Iris park directly ahead (which would be an attractive feature).

If a 9ft side yard setback remains in place, the most I could expand in the red outline is about 11ft to the side and 10ft to the front because I would need additional space in the blue area for a 6ft wide (minimum) stairway. This would mean that the addition to the building would not accommodate any additional units and not be worth the investment.

Example 2: Existing building with R4 zoning, but anticipate (hopeful for) future RM2 zoning, as it's half a block from the A-Line stop at Minnehaha and Snelling.

1612 Van Buren Avenue

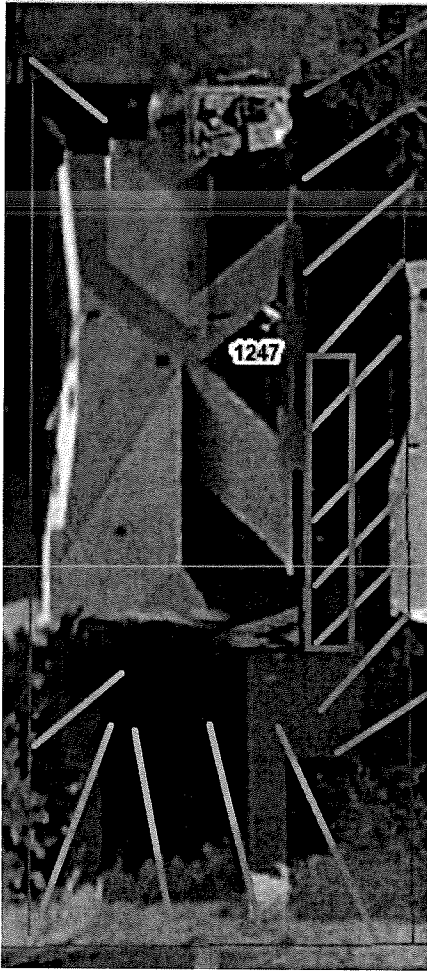


The orange lines show how the 9ft side and rear-yard setback eliminate the possibility expansion.

The blue boxes indicate where I'd like the option of building steps/decks to the 1st and 2nd floors to accommodate additional apartments. I have no option on the side yard, and have a very tight fit on the rear and would likely need to request a variance of a few feet unless I want to try to create a crazy spiraling staircase in the space off to the right and a narrow walkway along the back, which would be ugly.

Example 3: Existing building with R4 zoning but could be a candidate for RM1 zoning in the future with the 2040 plan.

1247/1249 Blair Avenue



You can see that the side yard setback would not allow me to build a straight stairway to the 2nd floor. The 2nd best option would then seem to be in the front with a roof dormer addition, raising costs

This was a fairly quick write-up. Please let me know if you'd like more information, ideas, thoughts from me.

Thank you,
Dustin Schroeder
dustin.schroeder@gmail.com

838 Laurel Ave, St. Paul, MN 55104

From: Katherine Cairns <kacairns007@gmail.com>

Sent: Thursday, April 23, 2020 11:43 AM

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

Cc: #CI-StPaul_Ward3 <Ward3@ci.stpaul.mn.us>; #CI-StPaul_Ward7 <Ward7@ci.stpaul.mn.us>

Subject: Comments on RM Zoning Study for 5-1-20 Council hearing

Mr. Dermody-

I have reviewed the proposed amendments to Chapters 60, 63, and 66 of the Saint Paul Zoning Code and have **public health and life safety concerns** with several of the proposed amendments. I also noted that the maps at the end of the report neglect to include several large public housing properties which would appear to be covered by City Zoning. I strongly recommend that all properties owned/maintained by St Paul Public Housing also be placed on the City maps. The background document described several of these properties, but when I reviewed the maps, other large public housing units were missing from these public documents.

Chapter 60- Sec. 60.301. Zoning districts established.

I strongly oppose the removal of the "low rise" designation for RM1 and RM2 residential housing districts on the basis of life safety concerns.

RM1 low-density, **low-rise** multiple-family residential district

RM2 medium-density, **low-rise** multiple-family residential district

Rationale: Increasing the size/number of units for more St Paul properties that are classified as RM1 and RM2 (compared to the number of RM3) puts potentially more children, individuals, and disabled persons at risk in the event of fires, community-spread and airborne infectious disease outbreaks. Mitigation efforts focused on a smaller number of larger buildings allows for targeted support, improved building code enhancements for air exchange, larger common hallways, fire suppression, windows that open, disability access inside the building, disability access for parking by the building, and access to affordable food/medications. The food deserts that exist in St Paul have increased since the 2017 report with the development along 1-94/University Ave. The City of St Paul also has T1- T4 zoning and housing options that should be pursued instead of the RM1 and RM2 districts. The dual purpose of increasing housing affordability and housing density is best served by new construction of larger RM3 properties rather than remodel/new construction of smaller RM1/RM2 properties that allow for disability access interiors/parking, sufficient air exchange, larger common hallways and fire suppression.

Thank you for your consideration.

Katherine Cairns

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Katherine A Cairns, MPH, MBA

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