

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: Dixies Project  
**Date:** Tuesday, June 29, 2021 7:46:33 AM

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-----Original Message-----

From: Michelle Loken Price <mlokenprice@gmail.com>  
Sent: Tuesday, June 29, 2021 7:16 AM  
To: Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
Subject: Dixies Project

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

Hello,

As a resident in Crocus Hill at 877 Lincoln Ave, I have very strong opinions about preserving the unique character of the neighborhood. As a former resident of 27 St. Albans St. S., I feel passionate about our need to protect what has been cherished; the historic beauty of the street and surrounding buildings and businesses must stay in harmony with the residential.

This Dixies project is an eye sore; a big ugly box with cheap materials and oversized dimensions. Grand Ave does not need to bow down to big developers and change its standards for one family's profit. Grand Ave is special and uniquely charming. This project would tip the scale so that more big and cheap projects can destroy what the neighborhood has worked so tirelessly to preserve.

Thank you for your time.

Michelle Loken Price  
877 Lincoln Ave.

Sent from my iPhone

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: 695 Grand Avenue proposal  
**Date:** Tuesday, June 29, 2021 7:46:15 AM

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-----Original Message-----

From: Stephen Gadiant <stephenegadiant@gmail.com>  
Sent: Monday, June 28, 2021 10:10 PM  
To: Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
Subject: 695 Grand Avenue proposal

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

Good evening,

My name is Stephen Gadiant and I oppose the proposed redevelopment at 695 Grand Avenue. I have lived at 809 Lincoln Avenue since 1978 and have witnessed the many changes that have occurred along the Grand Avenue corridor. This proposed project is too big and too tall for the area in question. The provisions for residential and customer parking are totally unrealistic and inadequate, and would be very detrimental to the surrounding neighborhood. I am supportive of mixed use development that would comply with the current zoning regulations for the east Grand Avenue overlay district, but am not supportive of exceptions or variances to the current zoning restrictions for this area of Grand Avenue. Thank you for your consideration.

Stephen Gadiant

Sent from my iPad

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: 695 Grand Avenue proposal  
**Date:** Tuesday, June 29, 2021 7:45:59 AM

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**From:** John Miller <mille108@umn.edu>  
**Sent:** Monday, June 28, 2021 6:32 PM  
**To:** Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
**Cc:** \*CI-StPaul\_PED-ZoningCommitteeSecretary <PED-ZoningCommitteeSecretary@ci.stpaul.mn.us>  
**Subject:** 695 Grand Avenue proposal

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

I am not in favor of the proposed development. Stick to the existing zoning regulations.

**John W. Miller, Jr.**

706 Lincoln Avenue

Saint Paul, MN 55105

651-227-5410

Principal Bassoon, Minnesota Orchestra (Retired)

Adjunct Professor of Bassoon, University of Minnesota (Retired)

President, Minnesota Bassoon Association

**From:** [James Hardy](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** zoning application 695 Grand/Dixies  
**Date:** Monday, June 28, 2021 5:06:53 PM

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Zoning:

My family has lived at 796 Summit Avenue for over 25 years.

I oppose the zoning application for 695 Grand. The proposal is simply too large for this area of Grand Avenue. Giving the proposal the green light will lead to block after block of tear-downs of existing properties to make way for additional large properties. We opposed Lund's initial suggestions for a similar large building right behind our home. The thought of a 5-story apartment complex looming over our backyard is frightening. The lack of privacy and sun blockage is concerning, not to mention potential loss in our property value.

5-story buildings are just too large for the corridor and character of the neighborhood. Parking can already be problematic and the addition of large numbers of units will bring more problems.

I also believe the "market-rate" proposed is really more of a luxury rate.

I believe that some development can be good to the neighborhood but please continue to enforce the East Grand Avenue Overlay and existing zoning rules. Mixed-use proposals that comply with current zoning rules should be given consideration, but the proposal for 695 simply does not comply.

Thanks for your consideration.

Brenda Hardy  
796 Summit Avenue  
St. Paul, MN 55106  
[hardy\\_25941@msn.com](mailto:hardy_25941@msn.com)

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: Dixie's Development: 695 Grand Avenue  
**Date:** Tuesday, June 29, 2021 7:45:35 AM

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**From:** Katie Bergstrom <SUMMIT780@msn.com>  
**Sent:** Monday, June 28, 2021 4:47 PM  
**To:** Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
**Subject:** Dixie's Development: 695 Grand Avenue

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

Dear Ms. Butler:

Please accept this e-mail as my opposition to the current zoning application to develop the existing Dixie's building at 695 Grand Avenue.

My name is Katie Bergstrom, and I live approximately 1.5 blocks away at 780 Summit Avenue.

I oppose the application because the proposed development is too large in scope, and completely out of scale with the current infrastructure on Grand Avenue. The size and nature of the project will harm the existing neighborhood exponentially.

I do support the current Grand Avenue Overlay and the existing zoning rules. As such, I do support a mixed-use development that complies with the existing Overlay and the current zoning rules.

Thank you--

Katie Bergstrom, Esq.  
780 Summit Avenue  
[Summit780@msn.com](mailto:Summit780@msn.com)

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: Zoning Variance at 695 Grand Ave  
**Date:** Tuesday, June 29, 2021 7:45:30 AM

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**From:** Eric Ruhland <dr.ruhland@gmail.com>  
**Sent:** Monday, June 28, 2021 4:40 PM  
**To:** Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
**Subject:** Zoning Variance at 695 Grand Ave

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

Dear Planning Commission,

My name is Eric Ruhland. I am a local home owner (790 Summit Ave), and local business owner(St Paul Pet Hospital).

I moved to St Paul over 8 years ago with the intention of starting a business and growing my family. I purchased my home on Summit Ave just over 7 years ago. During that time we have converted a dilapidated vacant home into a historic gem, and I retrofitted an old photo development area into a veterinary hospital. As a homeowner and business owner have obeyed every principle of historic preservation. I thought that my local leaders believed the same thing. I seem confused by the recent push to turn this neighborhood into something it is not.

By passing these variances you are disregarding the sacrifice of generations of people before you and jeopardizing the sensitive and intimate relationship between an exclusive historic residential neighborhood and its associated business district. Not one home owner I have spoken to in a 3 block radius of this project is on board with the variance. NOT ONE! I dont think you will find another issue that will be so sensitive with such a lasting impact on our community.

Are we the next Uptown? The next North Loop? I hope with all of my soul we are not.

Saint Paul has more history, character, and charm than that. I ask that you vote to reject these zoning variances proposed at 695 Grand Ave and others like it. We have not come all this way, being led by courageous leaders before us to bow to the pressure of the almighty dollar today.

Sincerely,  
Dr. Eric Ruland

--

Dr. Eric Ruhland *Owner*  
St. Paul Pet Hospital  
Cell: **651-238-6815**  
Office: **651-789-6275**  
Fax: **651-225-0869**

**From:** [Acito-Clouthier](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** 695 Grand Avenue - opposition to project  
**Date:** Monday, June 28, 2021 8:30:00 PM

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I want to express my opposition to the zoning application for 695 Grand/Dixies. I am a long time Summit Hill resident and believe the project is too big and too tall, and it is out of character with our neighborhood. It will damage the neighborhood.

I support a mixed-use development that would comply with current zoning rules. I support the East Grand Avenue Overlay and the existing zoning rules.

**Exceptions should not be made** for luxury housing, such as that proposed.

Margaret Clouthier  
715 Goodrich Avenue Goodrich Avenue

**From:** [Paul Acito](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Opposition to 695 Grand Avenue Zoning Exceptions  
**Date:** Monday, June 28, 2021 8:24:28 PM

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I am writing to you to express my opposition to the zoning application for 695 Grand/Dixies. I am a long time Summit Hill resident and am astonished at the lack of representation of residents' sentiments in this process.

The Summit Hill Association's recent vote seemed biased and not inclusive of residents' opinions while favoring commercial interests.

This project is too big and too tall, and it is out of character with our neighborhood. It will damage the neighborhood.

However, I support a mixed-use development that would comply with current zoning rules. I support the East Grand Avenue Overlay and the existing zoning rules.

**Exceptions should not be made** for luxury housing, such as that proposed.

Paul Acito  
715 Goodrich Avenue Goodrich Avenue  
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**From:** [Pereira, Luis \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: Dixies/695 Grand Public Comment:Opposition to Rezoning. CUP and Variances  
**Date:** Monday, June 28, 2021 3:32:07 PM  
**Attachments:** [image001.png](#)

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**From:** qwerty <jonmason659@gmail.com>

**Sent:** Sunday, June 27, 2021 11:48 PM

**To:** cedric.baker@gmail.com; tramhoang.sppc@gmail.com; adejoy@esndc.org; kristinemariongrill@gmail.com; nmhood@gmail.com; luiserangelmorales@gmail.com; jake.reilly76@gmail.com; usstmc@gmail.com; Pereira, Luis (CI-StPaul) <Luis.Pereira@ci.stpaul.mn.us>; Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>; aquanettaa@gmail.com; blindeke@gmail.com; gmcmurtrey07@gmail.com; k.mouacheupao@gmail.com; aperryman@genesysworks.org; mieeta@gmail.com; Jeff.risberg@gmail.com; wendyLunderwood@gmail.com; zhijun.yang@metrostate.edu; simon.taghioff@gmail.com

**Cc:** #CI-StPaul\_Ward1 <Ward1@ci.stpaul.mn.us>; Noecker, Rebecca (CI-StPaul) <Rebecca.Noecker@ci.stpaul.mn.us>; #CI-StPaul\_Ward3 <Ward3@ci.stpaul.mn.us>; #CI-StPaul\_Ward4 <Ward4@ci.stpaul.mn.us>; #CI-StPaul\_Ward5 <Ward5@ci.stpaul.mn.us>; #CI-StPaul\_Ward6 <Ward6@ci.stpaul.mn.us>; #CI-StPaul\_Ward7 <Ward7@ci.stpaul.mn.us>

**Subject:** Dixies/695 Grand Public Comment:Opposition to Rezoning. CUP and Variances

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



Dear Planning Commissioner:

Attached please find a link to a YouTube video that I would like to submit as public comment in opposition to the extreme land use intensity increases for Grand/ Dixies in the form of rezoning, CUP, and variances.

An earlier version, based on the March plan set, of this video was submitted as public comment to

the Summit Hill Association, on three occasions, but it was not admitted to the public record. An earlier version of the video was also shared with the development team.

<https://www.youtube.com/watch?v=za7YMzu02W8&t=116s>

The current version was modeled at scale to match the plans and elevations that were submitted to the city on June 3, 2021. This model and video are true in scale and proportion to the design being submitted and the buildings in the immediate context. This new model reflects the increase in height that was added to the building as well as the minor adjustments to the configuration of the building mass such as balcony projections. The model was constructed in Trimble Sketchup and geolocated to the site.

This video was made to show what the developers Reuter Walton, and the architects ESG and the landowner Peter Kenifick were trying to hide from being viewed. These developers are proposing a monster. The video shows the full size and scale of this building in context. Notably, images provided by the developer never show the entire building nor do they show it in relation to the neighboring structures. This video shows how much this massively out of scale pushes right up against the neighboring residences with malice.

At the halfway point, there is an alternative design. This design was presented in the spirit of compromise and has been presented to the developer team. Notably, this compromise design follows the spirit not the letter of the height limit requirement-- it is four stories, not three. To mitigate the added height, it strictly follows the traditional neighborhood design standards: particularly the required step downs and setbacks, solar orientation, and residential transitions. This alternative design (46-54 units) would garner support with the immediate neighbors.

The response I received from the developer was that the alternative design would be economically "unfeasible." Indeed, the only rationale provided against every concern and criticism raised has been economic feasibility. Yet, the developer has never shown any numbers to support this claim. Moreover, economic feasibility and developer profit is not listed as a criteria for rezoning. Economic feasibility and developer profits is not a condition for a conditional use permit. Economic feasibility and developer profits is not one of the required factors for variances.

The design is a worst case scenario of aggressive/ steroidal development that might happen to any site. This project will harm the property values of the neighboring structure. So negative tax values..are to be expected. The saddest part of this is we all want development to happen, but this design is a shot across the bow. They intend to strip the code of any say on what can get built. I thought we lived by rules and laws designed to produce fair and just outcomes. The Summit Hill vote did not reflect the neighborhood sentiment. The SHA board was supposed to represent, as evidenced by the official public comment received (58% opposed), the feedback from the meetings (overwhelmingly critical), or the strong support for the Overlay shown in the recent survey. The changes do not begin to comply with Traditional Neighborhood design standards, and violate the intent and spirit of the EG overlay.

And all for luxury housing? If we throw away all the rules for luxury-priced housing, how can we ever expect developers to provide affordable housing--there is no incentive.

Thank you.

Jon Mason

Resident. St.Albans St. S.

Attachments area

[Preview YouTube video 695 Grand Ave Development](#)



**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: opposed to Dixies plan  
**Date:** Monday, June 28, 2021 3:00:55 PM

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**From:** Chan Poling <chanpol@aol.com>  
**Sent:** Monday, June 28, 2021 2:34 PM  
**To:** Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
**Subject:** opposed to Dixies plan

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

Sonja,

Good afternoon. We're homeowners at 613 Goodrich Avenue in St. Paul and we oppose rezoning to T3 for 695 Grand Avenue. The proposed development would be too high and the footprint too large for the site and provide no transition to adjacent development. T3 is not consistent with the City's Comprehensive Plan and would constitute spot zoning.

We live in this neighborhood and want to see it thrive. But there must be a better way.

Thanks for listening and allowing our opinion into the record.

Best~

Chan Poling & Patty Radford Henderson

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: We oppose the zoning application for 695 Grand/Dixies.  
**Date:** Monday, June 28, 2021 2:10:53 PM

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**rom:** eeva savolainen <erksavolainen@gmail.com>

**Sent:** Monday, June 28, 2021 2:09 PM

**To:** Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>; \*CI-StPaul\_Contact-Council <Contact-Council@ci.stpaul.mn.us>

**Subject:** We oppose the zoning application for 695 Grand/Dixies.

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

To whom it may concern,

As former residents (we lived there for 8 years) at 9 St Albans my husband and I strongly oppose the proposed 695 Grand Ave development. It would ruin the character of the area and create a very difficult parking situation on that narrow one-way stretch. We support the East grand Ave overlay and the existing zoning rules.

Sincerely,  
Eeva Savolainen and Kari Sundstrom

--

Eeva Savolainen  
cell 651-261-0181

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: Dixie's development  
**Date:** Monday, June 28, 2021 2:01:41 PM

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**From:** \*CI-StPaul\_Contact-Council <[Contact-Council@ci.stpaul.mn.us](mailto:Contact-Council@ci.stpaul.mn.us)>  
**Sent:** Monday, June 28, 2021 1:58 PM  
**To:** Butler, Sonja (CI-StPaul) <[sonja.butler@ci.stpaul.mn.us](mailto:sonja.butler@ci.stpaul.mn.us)>  
**Subject:** FW: Dixie's development

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**From:** val cohn <[VALCOHN@msn.com](mailto:VALCOHN@msn.com)>  
**Sent:** Monday, June 28, 2021 10:13 AM  
**To:** \*CI-StPaul\_Contact-Council <[Contact-Council@ci.stpaul.mn.us](mailto:Contact-Council@ci.stpaul.mn.us)>  
**Subject:** Dixie's development

I am disappointed in the Summit Hill Association's decision to approve the plan for Dixies. I believe this project is way to large and the impact on the surrounding area is devastating. It will loom over the beautiful old surrounding buildings and destroy the feel not to mention cutting off the source of light. It just is not in keeping with what I thought was in the plans for the future of Grand Avenue. The many variances that will be required is something you should really think about. A project that requires this is just wrong.

Please study this carefully and do not, I repeat, do not approve. There is a better way so that historic Grand Ave doesn't down the road have the density and look of Lake and Hennepin. Closer, look at St Clair and Snelling and the building behind My Zion. Those two buildings are out of scale also in my opinion. They are not in keeping with the look and feel of Grand.

Again, look at this carefully and do not let this monster of a building get built.

Sincerely,  
Val Cohn  
829 Lincoln Ave.

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**From:** [val cohn](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Dixie's project  
**Date:** Monday, June 28, 2021 12:28:54 PM

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- I oppose the zoning application for 695 Grand/Dixies.
- I am a Summit Hill resident homeowner frequent shopper on Grand, etc.).
- This project is too big and too tall, and it is out of character with our neighborhood. It will damage the neighborhood.
- I support a mixed-use development that would comply with current zoning rules.
- I support the East Grand Avenue Overlay and the existing zoning rules.

Exceptions should not be made for luxury housing, such as that proposed.

**Please review and don't let this happen. A better plan that complies with the original plans for the future of Grand Ave. The mere fact that there will have to so many variances tells you that this design is just to big.**

Thank you. Val Cohn 829 Lincoln Ave.

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**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: 695 Grand Avenue/ Dixies Proposal  
**Date:** Monday, June 28, 2021 2:01:24 PM

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-----Original Message-----

From: \*CI-StPaul\_Contact-Council <Contact-Council@ci.stpaul.mn.us>  
Sent: Monday, June 28, 2021 1:58 PM  
To: Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
Subject: FW: 695 Grand Avenue/ Dixies Proposal

-----Original Message-----

From: Margaret Gadiant <margaretgadiant@gmail.com>  
Sent: Sunday, June 27, 2021 9:40 PM  
To: \*CI-StPaul\_Contact-Council <Contact-Council@ci.stpaul.mn.us>  
Subject: 695 Grand Avenue/ Dixies Proposal

I am a resident of the Summit Hill District and own a home at 809 Lincoln Avenue.

I am supportive of development on Grand Avenue within the framework of the zoning requirements that have been established.

I am, however, opposed to the proposed development on the Dixies site for a number of reasons. The size of the building is too tall and does not fit the character of the neighborhood. It does not provide for adequate parking for the residents of the proposed building, and also does not provide adequate parking for the patrons of the three businesses proposed. The traffic that this will cause will infiltrate the neighborhood. The service trucks that will be coming and going for this building will also cause traffic jams on Grand Ave.

Please do not allow the variances needed to provide for this development! As a past council member of the Summit Hill Association, I have worked with the city on parking issues and building proposals in the past. This development will be harmful to an Avenue which is currently going through challenges. Bigger does not mean better on Grand Avenue. Please insist that this development meet the zoning requirements currently in place.

Margaret Gadiant

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: Proposed big box development for 695 Grand Avenue Opposition  
**Date:** Monday, June 28, 2021 2:01:13 PM

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**From:** \*CI-StPaul\_Contact-Council <[Contact-Council@ci.stpaul.mn.us](mailto:Contact-Council@ci.stpaul.mn.us)>  
**Sent:** Monday, June 28, 2021 1:57 PM  
**To:** Butler, Sonja (CI-StPaul) <[sonja.butler@ci.stpaul.mn.us](mailto:sonja.butler@ci.stpaul.mn.us)>  
**Subject:** FW: Proposed big box development for 695 Grand Avenue Opposition

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**From:** privateartmn <[privateartmn@gmail.com](mailto:privateartmn@gmail.com)>  
**Sent:** Friday, June 25, 2021 1:18 PM  
**To:** \*CI-StPaul\_Contact-Council <[Contact-Council@ci.stpaul.mn.us](mailto:Contact-Council@ci.stpaul.mn.us)>  
**Subject:** Re: Proposed big box development for 695 Grand Avenue Opposition

Subject: Re: Proposed big box development for 695 Grand Avenue

Opposition to 695 Grand Avenue/ Dixie's proposed Development requesting multiple variances to current zoning restrictions

I support the East Grand Avenue Overlay and existing zoning regulations.

I am against the proposed development at 695 Grand Ave :

It is too big, too cheap and badly designed, not in keeping w the city zoning restrictions and most upsetting does not fit with the neighborhood's character and national preservation status.

It will ruin St Albans Street South forever and most destructive SET A BAD PRECEDENT FOR FUTURE DEVELOPMENT on Grand Avenue.

This kind of copycat cheap

" accountant" designed building proposed by the developer is seen all over the suburbs and has in fact destroyed the charm and business interest of shoppers in

Uptown in Mpls where great businesses are moving out as fast as they can.

To be constructed from the same cheap materials as trailer homes, this proposed big box structure is clearly not appropriate to be placed ( actually plunked -- requiring no site specific architectural design) in front of and next door to classic historic architecture on Saint Albans Street South.

St Albans Street's Clarence Johnson 1880 St Albans Row is a destination for travelers and neighbors alike. It is St Paul's most photogenic Street along with historic Summit Avenue.

Development proposed at 695 Grand will overpower and destroy the livability and most upsetting the irreplaceable vibe of this wonderful area and why?

Why would you want to destroy the timeless beauty and valued aesthetic of St Paul for cheap ( illegal-proposed structure is against current zoning restrictions) big box development that does harm to what the city is known and valued for. I AM AGAINST IT.

Susan St John, Private Art  
25 South St Albans St  
Saint Paul, 55105  
[privateartmn@gmail.com](mailto:privateartmn@gmail.com)  
651.491.4431

I am a long time home owner, resident and a business owner of Summit Hill and Crocus Hill neighborhoods in Saint Paul

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: 695 Grand Avenue Development Proposal  
**Date:** Monday, June 28, 2021 10:44:11 AM

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**From:** tess <tereszi.junge@gmail.com>  
**Sent:** Monday, June 28, 2021 10:38 AM  
**To:** Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
**Subject:** 695 Grand Avenue Development Proposal

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

I am opposed to the development of the Dixie's/Emmetts/Saji Ya location as proposed.

I want to:

Strengthen and add to existing density and housing options at a compatible scale  
Add housing density to grow and revitalize Grand Avenue  
Strengthen and add to economic diversity of housing options Summit Hill  
Support a mix of multifamily housing choices  
Strengthen and add to economic vitality of Grand Ave, Summit Hill and Saint Paul  
Support small businesses

I oppose:

New construction that fails to transition to existing areas of the neighborhood  
Oversize structures that do not follow existing zoning codes undermine value of existing residences  
New development that will alter the essential character of the neighborhood  
Bringing in a building design better suited for suburban areas detracts from the unique character of the neighborhood  
Establishing a precedent that leads to further projects that degrades the area's charm  
Developments need to complement the eclectic nature of the area  
The plans fail to protect the character of the Summit Hill neighborhood.

Please vote against the Dixie's/695 Project's requests to be given exceptions from existing zoning codes.

I want balanced development that respects the historic nature and character of the neighborhood.

Thank you.

Tess Junge  
1157 Hague Ave, St Paul, MN 55104

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: Dixie's Development Proposal  
**Date:** Monday, June 28, 2021 10:00:25 AM

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-----Original Message-----

From: Jeff Young <[jsy99@10x-computing.com](mailto:jsy99@10x-computing.com)>

Sent: Monday, June 28, 2021 9:32 AM

To: Butler, Sonja (CI-StPaul) <[sonja.butler@ci.stpaul.mn.us](mailto:sonja.butler@ci.stpaul.mn.us)>; \*CI-StPaul\_PED-ZoningCommitteeSecretary <[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)>

Subject: Dixie's Development Proposal

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

Hello,

My name is Jeff Young and I reside at 753 Lincoln Avenue (1 block from the proposed development). I have lived in the neighborhood since 1986.

I am writing to say that I oppose the current application for 695 Grand Ave.

I believe that the character of the development is out of scale with the rest of the neighborhood.

The East Grand Avenue Overlay was extensively debated and ratified as the controlling document for the development of this area. I would support development which complies with that document. The current proposal requests zoning changes and many variances which are NOT covered in the overlay.

It seems that we are being picked to death with variances every time a new development is requested. Let's stop this practice. If we want to change the character of the neighborhood, then we should start the discussion between the residents and businesses.

I definitely support a vibrant Grand Ave, but within the context of the character which makes this area desirable.

Let me know if you need some clarification on my position or if you have any questions.

Thanks,

Jeff Young



EHANSEN@BURNSHANSEN.COM

Direct Dial: 952-564-6252

VIA E-MAIL

June 28, 2021

St. Paul Zoning Committee  
PED-ZoningCommitteeSecretary@ci.stpaul.mn.us.  
25 West 4<sup>th</sup> Street, Suite 1400  
St. Paul, MN 55102

*Re: 695 Grand Rezoning & 695 Grand CUP with Variance  
ZF # 21-271-810 695 Grand Rezoning  
ZF# 21-269-061 695 Grand CUP & Variance*

Zoning Committee:

I write on behalf of concerned residents of the area surrounding the proposed 695 Grand Avenue New Mixed-Use Development (the "Project"). We learned that as part of the proposed development, there was a request to rezone the location, and obtain a conditional use permit and variance. In apparent recognition of the scale of the Project, and its requests for significant deviations from current requirements, the applicant now asks for its conditional use permit and variance request to be heard separately from its rezoning request. As the conditional use permit and variances are fundamentally connected to the rezoning, the requests should be heard in its totality at one hearing. My clients strongly object to File # 21-271-810 being held separately from File # 21-269-061 and request the applications be heard together on July 15, 2021.

Regardless of when the Project's applications are heard, my clients continue to object to the Project as currently designed. Although my clients would support a mixed-use development at the location, they do not support the scale and intensity of this development. A smaller structure would equally provide all of the benefits claimed in the developer's narrative and would reduce the negative impacts on the area. Moreover, a 3-story mixed-use project could be built by right, without rezoning, without a conditional use permit, and without any variances while also being consistent with St. Paul's Comprehensive Plan. Accordingly, my clients respectfully object to the 695 Grand Avenue project as it is currently proposed and request you deny rezoning, a conditional use permit, and a variance.

## I. 695 GRAND AVENUE PROPOSED PROJECT

The Project is a proposed New Mixed-Use Development at 695 Grand Avenue. The proposed project is a combined 153,854 square feet, with 123,353 square feet above grade, which includes a proposed main floor footprint of 30,210 square feet. The proposed project has a building height of nearly 60 feet. The application lists a lot size of 36,005 square feet, resulting in an apparent FAR for the proposed project of approximately 3.42. Setbacks for the proposed project include 8 feet on the north side facing an alley, 3 feet on the east facing St. Albans Street, 7 feet on the west, and 3 feet from the proposed restaurant patio on the south facing Grand Avenue. On all sides, balconies project beyond the building faces.

## II. REZONING

The Project's massing, land coverage, and height would dominate the location and surrounding neighborhood. Indeed, the Project's aberrant design relative to the area is reflected by its noncompliance with current zoning and the East Grand Avenue Overlay District. For this reason, the Project has submitted an application to rezone from B2 (Community Business) to T3 (Traditional Neighborhood) without the East Grand Avenue Overlay. Because the Project does not meet the criteria to be rezoned, its requests should be denied.

1. The rezoning request is not compatible with land use and zoning of the property within the general area.

The City of St. Paul Zoning Code<sup>1</sup>, the City of St. Paul's Comprehensive Plan ("2040 Comp Plan"), the Summit Hill/District 16 Neighborhood Plan ("Summit Hill Plan")<sup>2</sup>, and the East Grand Avenue Overlay District ("EG Overlay") are the guiding documents for the proposed project and the surrounding area. The Project does not

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<sup>1</sup> St. Paul's zoning ordinance was adopted for, among other things, the following relevant purposes:

- To promote and to protect the public health, safety, morals, aesthetics, economic viability and general welfare of the community;
- To implement the policies of the comprehensive plan;
- Encourage the most appropriate use of land throughout the city;
- To ensure adequate light, air, privacy and convenience of access to property;
- To provide for safe and efficient circulation of all modes of transportation, including transit, pedestrian and bicycle traffic;
- To encourage a compatible mix of land uses, at densities that support transit, that reflect the scale, character and urban design of Saint Paul's existing traditional neighborhoods; and
- To provide housing choice and housing affordability.

Sec. 60.103. The authority for zoning is "[f]or the purposes of promoting public health, safety, morals, and general welfare..." Minn. Stat. § 462.357, subd. 1.

<sup>2</sup> On February 15, 2006, the Summit Hill Plan was amended and adopted by the City Council.

comply with these guiding documents and would be a significant deviation for the area.

Summit Hill is primarily comprised of single-family residences with some duplex and 3-story multi-family housing also present. A business and commercial corridor runs along Grand Avenue, which includes the location of the Project. Under current zoning requirements for the location – B2 – the maximum height of a structure is 30 feet, or higher provided the structure is set back from all setback lines a distance equal to the height which said structure exceeds the maximum building height allowed. Sec. 66.431. Further, side and rear setbacks are required when walls containing windows or openings face interior lot lines. (Id.)

In addition to the St. Paul Zoning Code, the Project is also subject to the EG Overlay. *See* Sec. 67.601. Concerns related to significant deviations from the historic character of East Grand Avenue are precisely why the EG Overlay was implemented. EG Overlay was implemented following developers' exploitation of zoning loopholes and disregard for East Grand Avenue's existing character. Therefore, within the EG Overlay, maximum building footprints are limited to 25,000 square feet and a total above ground building size of 75,000 square feet. Building heights are limited to a maximum of three stories and 36 feet for commercial-residential mixed use buildings.

Under the EG Overlay, the Project must also "be consistent with the applicable design standards unless the applicant can demonstrate that there are circumstances unique to the property that make compliance impractical or unreasonable." Sec. 66.343(a). Significantly, "[t]ransitions in density or intensity shall be managed through careful attention to building height, scale, massing and solar exposure." Sec. 66.343(b)(2).

The proposed rezoning to T3 would permit a building height of 55 feet. The Project proposes a structure that is approximately 60 feet tall. The Project would literally tower over the surrounding area. The preexisting structures immediately surrounding the Project are 20 to approximately 45 feet shorter. The footprint of the Project covers approximately 85% of the existing lot with impervious surfaces. The Project has a building size 1.64 times larger and 1.66 times taller than what is allowed within the EG Overlay. In essence, the Project proposes a full project and 2/3rds at a single location.

St. Paul zoning ordinance requires the incorporation of existing city-approved plans in preparing any development plan for a T3 site. Sec. 66.344(a).<sup>3</sup> The EG

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<sup>3</sup> Previous plans. Any pre-existing city-approved plans, such as small area plans, station area plans, precinct plans or master plans, prepared for the site or the surrounding area shall be incorporated as appropriate in preparing any development plan for a T3 or T4 traditional neighborhood district site. It is understood that these plans may occasionally be amended as conditions change. The intent of such plans shall be realized to the extent possible in any subsequent development plans.

Overlay is a city-approved plan found within St. Paul's zoning ordinances. Sec. 67.601. In developing the Project and proposing a T3 designation, the applicant did not attempt to incorporate the EG Overlay as required by St. Paul zoning ordinance. The height, bulk, and intensity of use clearly exceeds the building regulations of the EG Overlay and the required TN2 design standards. Sec 67.602. Rezoning the property to T3 would establish a use classification inconsistent with surrounding uses and create an island of nonconforming use within the EG Overlay. Such a zoning amendment would constitute spot zoning, which is an invalid act. *State, by Rochester Ass'n of Neighborhoods v. City of Rochester*, 268 N.W.2d 885, 891 (Minn. 1978). The Project's request to rezone should be denied because its use is not compatible with the land use and zoning required by the EG Overlay and would also amount to illegal spot zoning.

**2. The property is suitable for uses permitted under the existing zoning classification.**

Under the existing B2 and EG Overlay zoning, redevelopment to a mixed-use property is permitted. Sec. 66.421. The Project could be designed to be permitted under the existing zoning classification. Moreover, such a project would be supported by the Summit Hill Plan. "B-2 and B-2C zoning allows uses most appropriate to commercial activity on Grand Avenue." (G5a) The true reason for seeking to rezone the property is to build the largest Project possible to maximize their investment. The existing zoning classification is based upon the careful consideration of stakeholders. The Project's bottom-line is not a sufficient basis to rezone the property.

**3. The Project is inconsistent with the trend of development in the area.**

The Project is surrounded by residential properties, which are shorter, less dense, and consistent with the uniquely historic character of the area. Mixed-use development could be constructed in the area under the existing zoning classifications, which would match the context and character of the area. The Project's height, mass, and density is orders of magnitude larger than surrounding apartment buildings and would be an obvious deviation from the trend of development in the area.

**4. The Project is inconsistent with the Comprehensive Plan and the plans for the area that have been adopted by the City Council.**

As discussed previously, the Project is subject to the 2040 Comp Plan and the Summit Hill Plan. There is undoubtedly a tension between the desire to construct new mixed-use properties while also preserving the character of historic neighborhoods. The 2040 Comp Plan recognizes this, and it directs that a balance must be struck between preserving the historic neighborhood and new development

by considering the impact of the Project on the character-defining features of the area and the area context. 2040 Comp Plan Policy HP-16.

The abrupt change from shorter residential properties to the Property cannot avoid disrupting the area's overall pattern of architectural harmony and continuity. The Project's significant height and proposed solar orientation will cause maximum shadows to be cast on the surrounding properties. Additionally, the surrounding properties will have far less privacy as residents of the Project loom over them at heights not currently permitted. Neighboring properties will be left to deal with the consequences of a rezoned property not previously contemplated and that can only be built through a significant deviation from current zoning. Significantly, 2040 Comp Plan Policy LU-29 directs zoning action to ensure that building massing, height, scale and design transition to those permitted in adjoining districts. The imposition of a significantly taller structure, when mixed-use development within the EG Overlay is limited to 36 feet, does not provide a transition to building designs in the adjoining areas. A rezone of the property should not be permitted for the sake of building the maximum number of luxury apartments.

The Project is also inconsistent with the Summit Hill Plan. The Summit Hill Plan explicitly discourages rezoning and variances in congested areas. "Rezoning and variances are opposed by SHA in those areas where parking and traffic problems create undue hardship for neighboring businesses, residents, and visitors." (G6) This area has intense use of on-street parking by current land uses. Rezoning of this parcel is not supported by the Summit Hill Plan. Moreover, the Summit Hill Plan expresses a goal of ensuring "that new and renovated mixed-use buildings on Grand Avenue respect the historic nature and character of the neighborhood..." (H9) Policy G10 supports the building size limits that became the EG Overlay district. Simply put, the Project is incompatible with the zoning classification within the traditional neighborhood and inconsistent with area plans. A legally sufficient reason to deny the Project's rezoning request is that it is "not appropriately scaled in light of the surrounding land use." *R.A. Putnam & Assocs., Inc. v. City of Mendota Heights, Dakota Cty.*, 510 N.W.2d 264, 268 (Minn. Ct. App. 1994)

The increased density and intensity of land use at 695 Grand Avenue would also not be in the best interest of the general welfare and safety of the community. The increased density and intensity of land use would strain existing sewer, water, parking, road, and public service infrastructure. The residential neighborhood will bear the burden of increased traffic congestion and parking demand. As a result, individual's safety will be at risk due to increased traffic and an inability to adequately clear snow during the winter. Decreased sight lines from minimal setbacks and increased traffic in the alley and neighboring streets risks the safety of pedestrians and bikers.

Furthermore, contrary to 2040 Comp Plan Policy LU-1, the increased density of the Project is not focused in an area with high existing or planned transit capacity.<sup>4</sup> Grand Avenue is serviced by a single bus route, Route 63.<sup>5</sup> With minimal existing transit capacity, but an increase in density, more personal vehicles will be used. Individuals who can afford to live in the Project's luxury apartments will likely have personal vehicles. This issue is particularly acute because the area already has high existing rates of car ownership. An increase in personal vehicles will exacerbate preexisting traffic and parking congestion and strain road and public service infrastructure.<sup>6</sup> Bikers along the existing bikeways will be forced to navigate around additional traffic and parked cars. Pedestrians on St. Albans will be endangered by the blind exit located just three feet from a heavily used residential sidewalk.

Not only does the Project fail to promote the safety and welfare of the community and deviate from the existing neighborhood character, but it does not provide the housing the area needs the most. Goal 3 of the Housing section of the 2040 Comp Plan is to "[p]rovide fair and equitable access to housing for all city residents." Further, the 2040 Comp Plan states a policy to "increase housing choice across the city to support economically diverse neighborhoods by pursuing policies and practices that maximize housing and locational choices for residents of all income levels." 2040 Comp Plan Policy H-16. The Summit Hill Plan also promotes the retention of rental housing options and affordability. (H12)

Rental rates in the Summit Hill neighborhood average approximately \$920.00 per month.<sup>7</sup> Monthly rental rates for the Project will range from \$1,400.00 for an alcove to \$2,750 for a two-bedroom apartment. Parking will be an additional \$175.00 per month. Additional market-rate rental properties do not address the real need and demand for affordable housing. Continued construction of large developments of above market-rate rentals jeopardize lower-density apartment buildings that exist along Grand Avenue and elsewhere in the neighborhood, which qualify as naturally-occurring affordable housing. Not only do they support and enhance the historical character and charm of the neighborhood, but they are also affordable compared to new developments. The Project risks placing upward pressure on rent within the area

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<sup>4</sup> Metro Transit has 14 routes defined as "High Frequency"—routes with no more than 15 minutes between trips; five of these service St Paul: Greenline LRT, A Line BRT, Route 54 on W 7<sup>th</sup> Street, Route 64 along Maryland Avenue, and Route 21 that connects Selby Avenue to Lake Street in Minneapolis.

<sup>5</sup> Route 63 generally has a frequency of 20 minutes or more most days. During rush hour, the frequency is approximately 10-20 minutes. Stated another way, 77% of the time Route 63 has a frequency of 20 minutes or more.

<sup>6</sup> The Project's Trip Generation Study optimistically expects 25% of residents will exit during peak morning hours.

<sup>7</sup> Gabriella Norton & Carolyn Szczepanski, MARKET WATCH: Saint Paul, Minnesota Housing Project, July 2018, *available at* <https://www.mhponline.org/publications/rental-market-watch/issue-2-saint-paul>.

and displacing less economically secure residents.<sup>8</sup> More affordable housing near new construction are likely to have rents higher compared to similar housing.<sup>9</sup> Even worse, allowing luxury housing to exceed all zoning limits will create enormous incentives toward the demolition of existing smaller multifamily housing, like the quintessential brick two-story apartment that provides much the affordable housing on and around Grand Avenue. The result is an economically exclusionary area that diminishes the diversity and vibrancy of the community. This Project is inconsistent with 2040 Comp Plan Policy H-45, which supports the preservation and maintenance of historic housing stock as an affordable housing option.

Because the proposed rezoning of the property is inconsistent with the development of the area or Comprehensive Plan, and does not advance the purpose and intent of St. Paul's zoning ordinances, the EG Overlay, and the Summit Hill Plan, the Project's request to rezone to T3 should be denied.

### III. CONDITIONAL USE PERMIT

In addition to the rezoning of the property, the Project previously requested a Conditional Use Permit ("CUP") to allow for a 59' 10" building height and for proposing a building over 25' in height adjacent to RT2 (Townhouse Residential District) zoning. My clients are unsure if this request will change. However, it is worth considering the extent to which the Project is misaligned with the area. St. Paul Ordinance articulates the required findings for approval of a condition use as follows:

- (a) The extent, location and intensity of the use will be in substantial compliance with the Saint Paul Comprehensive Plan and any applicable subarea plans which were approved by the city council.
- (b) The use will provide adequate ingress and egress to minimize traffic congestion in the public streets.
- (c) The use will not be detrimental to the existing character of the development in the immediate neighborhood or endanger the public health, safety and general welfare.

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<sup>8</sup> Atticus Jaramillo & Chip Halbach, *Sold Out*, Minnesota Housing Project, October 2016, available at [https://www.mhponline.org/images/Sold\\_Out\\_final\\_revised\\_small.pdf](https://www.mhponline.org/images/Sold_Out_final_revised_small.pdf).

<sup>9</sup> Anthony Damiano & Chris Frenier, *Build Baby Build?: Housing Submarkets and the Effects of New Construction on Existing Rents* (Center for Urban and Regional Affairs, Working Paper 2020) available at <https://www.cura.umn.edu/research/research/build-baby-build-housing-submarkets-and-effects-new-construction-existing-rents>.

(d) The use will not impede the normal and orderly development and improvement of the surrounding property for uses permitted in the district.

(e) The use shall, in all other respects, conform to the applicable regulations of the district in which it is located.

#### Sec. 61.501

As discussed above, the Project is subject to both the 2040 Comp Plan and the Summit Hill Plan. Contrary to those comprehensive plans, the Project disregards the historic character of the area, does not provide affordable housing, and is not focused on an area with high transit capacity. Under either plan, the intensity of use proposed will not be in substantial compliance and this condition is not met.

Moreover, the use will be detrimental to the existing architectural character of the area and endangers public safety. The Conditional Use Permit is only required because the Project is nearly 20 feet taller than any surrounding structure and, in the event it was rezoned, would still exceed the height allowable under T3 classification. This is *prima facie* evidence the Project would be detrimental to the existing character of the area. Increased height would cast maximum shadows on surrounding residential properties and neighbors' privacy would be imperiled by residents and guests of the Project. The increase in height is presumably proposed so an additional floor of residences can be constructed at the location. The increased density and intensity of land use would further burden already stretched infrastructure. This would have a knock-on effect endangering the safety and general welfare of community members. This condition is not met.

The Project will also impede the normal and orderly development and improvement of the surrounding property for uses permitted in the district. The introduction of a large building will impede the development because it will be an outlier zoned T3 in a historic area of smaller residential and commercial properties. This would lead to a race to rezone the area and construct equally large residential and mixed-use developments thereby destroying the orderly development of Grand Avenue as an area of historic, smaller buildings. It is clear based upon the surrounding zoning classifications and EG Overlay, which limits the size of mixed-use development, that normal and orderly development included limitations on the size and height of buildings. This condition is not met.

A conditional use permit for the purpose of maximizing the number of luxury apartments does not meet the required criteria. Because the Project cannot establish the required findings, its Conditional Use Permit should also be denied.

#### IV. VARIANCE

Assuming, for the sake of argument, the location is rezoned to T3, the Project previously required a variance for front setback from Grand Avenue. Further, it is our reading of the St. Paul zoning code that additional variances should be required for this application.<sup>10</sup> For a variance, the following criteria must be met:

- (a) The variance is in harmony with the general purposes and intent of the zoning code.
- (b) The variance is consistent with the comprehensive plan.
- (c) The applicant has established that there are practical difficulties in complying with the provision, that the property owner proposes to use the property in a reasonable manner not permitted by the provision. Economic considerations alone do not constitute practical difficulties.
- (d) The plight of the landowner is due to circumstances unique to the property not created by the landowner.
- (e) The variance will not permit any use that is not allowed in the zoning district where the affected land is located.
- (f) The variance will not alter the essential character of the surrounding area.

#### Sec. 61.601

As discussed above, the Project is not in harmony with the general purposes and intent of the zoning code, nor is it consistent with the 2040 Comp Plan or Summit Hill Plan. Moreover, a Project of this scale will significantly alter the essential character of the surrounding area. Its height, bulk, and increased front setback would be a notable anomaly and interrupt the texture and flow of the adjacent blocks and

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<sup>10</sup> The City is also in receipt of a letter identifying other variance(s) that should be applied, including off-street loading requirements (63.400), as well as from the dimensional standards stipulating height and setback requirements for Table 66.331(e) along the alley and St Albans. Further, the proposal does not meet required Traditional Neighborhood design standards (66.343); these must be met "unless the applicant can demonstrate that there are circumstances unique to the property that make compliance impractical or unreasonable." (66.343). The most egregious departures from these required standards are from Design Standards 2 and 3, which require "careful attention to building height, scale, massing and solar exposure" as well as, on corner lots such as this, matching the establish building line. The U-shaped design with design with a northern "bottom" of the U located just 8 feet from the property line is particularly noteworthy as it does not evince "careful attention" to solar exposure.

neighborhoods. The Project would be an abrupt departure from the historic character of the neighborhood.

Furthermore, the Project cannot establish there are practical difficulties in complying with current zoning. Any variance request is not a result of the unique topography of the area or the Project's location relative to other constraining features. Rather, the developer has made a choice – a choice driven solely by economic considerations – to build a massive structure at this location with minimal setbacks and an outdoor patio area. Any plight of the developer has been created by themselves. Nothing precludes the Project from using the property for a mixed-use development which conforms to the zoning code and required setbacks. The Project, as currently proposed, is out of scale for the size of the lot and its location. Its construction would lead to potentially large negative impacts with regard to parking spillover into an already parking-challenged area, increased traffic, as well as blocking light/creating shadows across nearby properties due to its height and smaller setbacks. The driving force behind the Project's request is to improve its economic feasibility. This is insufficient. For these reasons, the Project's request for a variance should also be denied.

## V. CONCLUSION

The Project proposes a mixed-use development at 695 Grand Avenue that exceeds what is permitted under current zoning classifications. Grand Avenue and the surrounding Summit Hill neighborhood was specifically zoned to maintain its uniquely historic character and vibrant community. Instead of incorporating itself into the community, the Project proposes a hulking structure that would impose itself on the community and change its essential character. The building footprint and height of the Project would be a clear outlier for the area. It should be noted, community members would welcome new mixed-use development along Grand Avenue. They are simply opposed to a Project that is an obvious deviation from currently existing structures, endangers the safety and welfare of the community, strains infrastructure, and appears driven solely by economic considerations. Promotion of the goals and policies set forth in the 2040 Comp Plan and Summit Hill Plan could be accomplished without the need to rezone the property. A three-story mixed-use development would be a more appropriate use of the land and would be more likely to conform to the existing zoning code or T2 zoning. Moreover, a smaller structure would provide more housing in a neglected segment of the housing market while providing a smooth transition to the surrounding residential neighborhood. The Project has not established the character of the neighborhood has changed to such an extent that no reasonable use could be made of the property in its current zoning. *Honn v. City of Coon Rapids*, 313 N.W.2d 409, 419 (Minn. 1981). As currently designed, the Project is counter to the protections in place to preserve this historic neighborhood and the safety of its residents. Because the Project has failed to

St. Paul Zoning Committee  
Page 11  
June 28, 2021

establish a basis for rezoning, a conditional use permit, or a variance, their requests should be denied.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik F. Hansen', with a long horizontal flourish extending to the right.

Erik F. Hansen  
Attorney at Law

EFH/DRR/md

cc: Client

**From:** [Susan Elsass](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** 695 Grand Ave. Dixies  
**Date:** Monday, June 28, 2021 9:25:07 AM

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To whom it may concern,  
I live at 768 Lincoln Ave, Saint Paul MN 55105. I've lived in this neighborhood for 35 years. I love Grand Ave.  
I support a mixed use development with the current zoning rules at 695 Grand Ave.

I think, the current proposal is too tall and big and does not fit in the historical character of Summit Hill neighborhood. If this is approved, it will not benefit the historic area or its residents.

Sincerely,  
Susan Elsass

Sent from my iPad

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: 695 Grand  
**Date:** Monday, June 28, 2021 9:03:31 AM

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**From:** Colleen Langford <homesbycolleen@yahoo.com>  
**Sent:** Saturday, June 26, 2021 12:02 PM  
**To:** Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
**Subject:** 695 Grand

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

Please vote no to allowing such a huge building on Grand ave..it will destroy the historic beauty .

Exceptions to the Grand Ave overlay should not be made.

Thank you from a long term St Paul resident.

Colleen Langford

22 Grotto

St Paul Mn 55105

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: I oppose the zoning application for 695 Grand/Dixies.  
**Date:** Monday, June 28, 2021 9:03:01 AM

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**From:** Robert Langford <rob.langfordjr@gmail.com>  
**Sent:** Saturday, June 26, 2021 12:38 PM  
**To:** Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>; \*CI-StPaul\_Contact-Council <Contact-Council@ci.stpaul.mn.us>  
**Subject:** I oppose the zoning application for 695 Grand/Dixies.

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

Good Morning,

I am a Summit Hill resident/owner, 22 Grotto St. S., and I wish to voice my opposition to the proposed project at 695 Grand for these reasons;

- **This project is too big and too tall, it is out of character. It will damage the neighborhood.**

I support a mixed use development that would comply with the current zoning rules.

Sincerely,  
Rob Langford  
22 Grotto St. S.

**Robert (Rob) Langford Jr.**

Results Referral Services  
Colleen Langford & Associates  
RE/MAX Results

651-271-0598 / *cell*  
651-698-8006 / *office*  
651-698-7686 / *fax*

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: 695 Grand Ave Dixies  
**Date:** Monday, June 28, 2021 8:55:06 AM

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-----Original Message-----

From: Nancy Kelly <nancydudleykelly@gmail.com>  
Sent: Sunday, June 27, 2021 6:56 PM  
To: Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
Subject: 695 Grand Ave Dixies

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

We do not support the proposed project for the corner that is now occupied by Dixie's. We have lived in the neighborhood for the past 60 years. This proposed building will ruin the character of the neighborhood. It will pose dangers to pedestrians and cyclists. The project is too big and too tall.

Please do n to allow this to happen.

Nancy and Peter Kelly

**From:** [privateartmn](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Date:** Friday, June 25, 2021 3:55:12 PM

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I am very much against such a development in that area of Grand Avenue. It is too big, out of character for the neighborhood, and totally unnecessary. I think it would be damaging to the businesses that are already functioning very well in that area. A big ugly box cannot be an asset. It would also use up space which is well used now for those who live and shop there and in the general area.

Please do not build such a structure.

Sincerely,

Anne DeCoster  
neighbor on Nina Street

Sent from my iPhone

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: Dixie's  
**Date:** Friday, June 25, 2021 2:39:00 PM

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**From:** Rosalyn Goldberg <[blueskater3@gmail.com](mailto:blueskater3@gmail.com)>  
**Sent:** Friday, June 25, 2021 2:25 PM  
**To:** Butler, Sonja (CI-StPaul) <[sonja.butler@ci.stpaul.mn.us](mailto:sonja.butler@ci.stpaul.mn.us)>; \*CI-StPaul\_Contact-Council <[Contact-Council@ci.stpaul.mn.us](mailto:Contact-Council@ci.stpaul.mn.us)>  
**Subject:** Fwd: Dixie's

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

[sonja.butler@ci.stpaul.mn.us](mailto:sonja.butler@ci.stpaul.mn.us), [Contact-Council@ci.stpaul.mn.us](mailto:Contact-Council@ci.stpaul.mn.us)

I am forwarding a message I sent to SHA re: 695 Grand Ave.

Another thing to consider is developing our non-existent downtown. That is where large projects like this belong.

Thank you.

----- Forwarded message -----

From: **Rosalyn Goldberg** <[blueskater3@gmail.com](mailto:blueskater3@gmail.com)>  
Date: Sat, Jun 12, 2021 at 12:20 AM  
Subject: Dixie's  
To: ZLU Committee <[ZLU@summithillassociation.org](mailto:ZLU@summithillassociation.org)>

*I am adamantly opposed to any rezoning or variances in relation to 695 Grand.*

*The developers knew prior to their proposal that their plans were non-compliant.*

*They had multiple opportunities to redesign to be in compliance. They are operating under the guise of "working with neighbors", yet they repeatedly ignore the "elephant in the room", which is height and mass ! Then, to add insult to injury, their last design was TALLER ! They obviously have no respect for the neighborhood. They want what they want. They said*

*they could not make it smaller.  
This is a load of crap ! They  
keep referencing the building  
on Oxford and Grand. That  
building is also non-compliant. I  
was around for that fight.*

*Those developers finally  
compromised and made the  
building one story shorter, and  
implemented a wedding cake  
design to "hide" the mass.*

*We can not have "spot zoning"  
!!! Maybe all the properties in*

*Summit Hill could all have their own personal zoning. This is ridiculous ! The overlay plan was designed to prevent this type of thing. Much effort, time, and research went into it. The recent Neighborhood Plan survey made it very clear what the neighborhood wants. It does not want T2/T3 zoning ! This is a historic neighborhood. It does not fit in. What happens down the road if this*

*building is sold ?*

*The developers kept saying Dixie's building was "old". This is laughable. I was walking in the neighborhood the other day and passed houses with signs on them saying, "Built in 1880", "built in 1893". No one in this neighborhood is buying the "too old" line. I am older than Dixie's building.*

*You must be very mindful of making decisions you can not*

*reverse !! This will change the neighborhood forever. As you know, there are other "developments" on the horizon. You can not "give one kid and ice cream cone and not the other". Other developers will want these exceptions, as well.*

*We are not University and Snelling, where two of these buildings are already going up.*

*Now they want to add three*

*restaurants and a retail space. You must imagine the traffic and parking issues this will create.*

*For those of you who live deep into the neighborhood, you need to know that living on Grand Ave is very different from living on Lincoln or Crocus Hill. I have spoken with my Lincoln neighbors many times over the years regarding this. It is like a totally different*

*neighborhood. Many renters have no off street parking. They will be impacted greatly. It will no longer be a "pedestrian-friendly" neighborhood. You can barely cross the street now. The traffic is already working its way deeper into the neighborhood. This project is totally disrespectful to the neighborhood. They CAN make the project smaller, they just*

*don't want their profits smaller. Follow the money...*

*Please do not "kill the goose that laid the golden egg".*

*What you love about Summit Hill will be destroyed. There are rules for a reason. The developers intentionally, and with full knowledge of the zoning laws created a project they knew from the beginning was non-compliant. How arrogant and insensitive ! Do*

*not allow Grand Ave to become Greed Ave. Please do not allow rezoning ! It won't stop there. It is a Pandora's Box. Please !!1 I love this neighborhood. Don't allow it to be destroyed. In addition, they mentioned "no guarantees" when it came to renting those "dream" spaces to chains. We have been fighting this for years. Mom and Pop's won't be able to afford to be on Grand. No one*

*is going to drive from Maple Grove to a neighborhood with no parking to go to Bed Bath and Beyond. They will come for the one and only Cafe Latte.*

*By the way, they did not include enough parking for all that is going into that building. They keep changing their tune. First they were not going to charge their tenants for parking, now they are. The employees of these businesses*

*will not be able to live there. Also, because the residential units are rental, they can jack up the rent anytime.*

*This oversized project is not what is good for the neighborhood. This is a selfish, disrespectful project designed to put money in the developers pockets.*

*SHA represents this neighborhood. The neighbors have spoken. It is your*

*obligation to deny the rezoning  
and variances. Please do not  
be bamboozled by their smoke  
and mirrors.*

*Please preserve this historic  
and wonderful neighborhood.  
Do not turn us into Uptown.*

*Thank you.*

*Rosalyn Goldberg*

*1023 Grand Ave., #6*

*(40 years a renter on Grand,  
worked at Estaban's in 1980)*

*I realize this was sent a few*

*minutes after midnight. I got home late, and I do not type fast. I did not even edit this, so I could get it to you on time. Please consider this when making your decisions. Thank you. Choose wisely.*

June 29, 2021

## OPPOSITION TO DIXIES/ 695 proposed project

I am writing to strongly oppose the project that is being proposed by Peter Kenefick and Reuter Walton Developers to be placed at the current site of Dixies, Saji Ya and Emmetts restaurants at 695 Grand Avenue, Saint Paul.

The building as proposed will totally overwhelm the neighborhood. It is too tall, too massive, and too out of character with the historic neighborhood in which it would reside. Further, the structure fails to transition into the adjacent neighborhood. The resulting appearance will be that of a misplaced/ misfitting big box. It is an architectural intrusion into the heart of an historic neighborhood.

The structure will tower above its neighbors, stick out like a sore thumb, greatly tax an already prohibitive parking problem and present danger to pedestrians, cyclists and cars.

If this building is built, it will start a cascade of lookalike massive buildings that will change the essential character of Grand Avenue.

The 695 Grand Avenue development team has taken the position that the 695 Grand Avenue proposed project “fits” into the existing neighborhood since there is one tall building in the vicinity –Grand Place at 745 Grand Avenue.

I assert this comparison is invalid, disingenuous, highly misleading, and will set a terrible precedent.

### Grand Place

Built in 1981, prior to East Grand Overlay District zoning

- Tallest building on Grand Avenue –65 feet tall
- Set back from Grand Avenue by approx. 30 feet
- Set back from its East and West neighbors by 12 feet
- Set back 26 feet from the alley
- Built on the north side of street so this building casts shadow onto a parking lot

Further, Grand Place is strictly a residential building –bringing no exacerbated traffic.

In contrast, the 695 project, basically “fills the available space” with **84 percent lot coverage**.

695 Grand would be:

- Set back from an alley that is already treacherously icy in winter by a mere 8 feet—with no physical barrier between the proposed building and the alley
- Setback from Grand Avenue by 3 feet
- Setback from its neighbors to the West by 6 feet
- Setback from its neighbors to the East by 3 feet
- Built on the North side of the street –thus will cast shadows on residential neighbors
- The 695 building will house 4 commercial restaurants/ retail places, whereas Grand Place is a residential building. Thus 695 will generate extra noise/ extra traffic, delivery trucks, extra trash pickups, extra visitors, cars etc. This is an invalid comparison.

I strongly urge the Zoning Committee, City of Saint Paul to reject the zoning, CUP and variance requests of the 695-development team.

Marilyn Bach  
9 Saint Albans Street South  
Saint Paul, MN 55105

**June 28, 2021**

**To: City Planning Commission and Zoning Committee**  
**From: Peggy Reichert**  
**617 Goodrich Avenue**  
**Re: Opposition to T3 Rezoning of 695 Grand Avenue**

**With respect, I must strongly disagree with the findings of the staff report that T3 zoning for this site is consistent with the adopted 2040 Comprehensive Plan.**

I am writing from the perspective of a 48-year resident of Summit Hill, a professional city planner, and former Planning Division Director for Saint Paul PED from 1980-91. I fully support the redevelopment of Grand Avenue and the addition of more housing. But this rezoning and the proposed project is totally out of scale and will negatively impact the adjacent area.

The staff report does not adequately consider some of the most critical policies in the Land Use Chapter and Housing Chapters of the 2040 Plan that address redevelopment in a fully developed and historic neighborhood such as Summit Hill.

*Policy LU-29. Ensure that building massing, height, scale and design **transition** to those permitted in adjoining districts.*

*Policy LU-36. Promote neighborhood serving commercial businesses within Urban Neighborhoods that are **compatible with the character and scale of the existing residential development**.*

*Policy H-47. Encourage high-quality urban design for residential development that is **sensitive to context**, but also allows for innovation and consideration of market needs.*

This site at 695 Grand Avenue is designated as part of a Mixed Use corridor in the 2040 Comprehensive Plan. Not all Mixed Use corridors are the same. Grand Avenue is a shallow strip of mixed uses, generally one lot deep, wedged between historic Summit Avenue on the north and an historic Urban Neighborhood to the south. Careful attention to design and compatibility with adjacent residential is critical for this area, as emphasized in these Comprehensive Plan policies.

This site is proposed for a project that would max out and even exceed T3 zoning by using additional variances and a CUP. The site is simply not large enough to be developed at this intensity with reasonable transition to the surrounding area. It is totally out of scale. The mass coupled with a height of nearly 60' feet with such minimal setbacks to the rear and sides, will simply overwhelm the area.

Grand Avenue has a mix of one- and two-story commercial buildings and two- and three-story residential apartments and condos. These apartments and condos generally provide the **most affordable housing** in the neighborhood. They should be protected and maintained.

The staff report cites the taller condo at 745 Grand as evidence of compatibility with the surrounding area. But this condo on the corner of Grand and Grotto is a true anomaly on the Avenue. It detracts rather than contributes to the essential character of the Avenue. The comparison also fails to note that this condo is generously set back from surrounding development on all sides which lessens to some extent its impact on the adjacent area. It is surrounded primarily by commercial development and the large House of Hope parking lot to the north on Summit.

A taller, 4 story mixed use project at Grand and Oxford is a better comparison, but this building is not as massive or tall, and is generously set back over 30 feet from the from the alley to the south. The upper floors are stepped back and the first-floor commercial abuts the sidewalk as appropriate on Grand. This design is a far better fit for the neighborhood and represents a far better model for redevelopment along Grand.

Furthermore, if the proposed site at 695 Grand is considered in the context of the closely adjacent Urban Neighborhood, T3 zoning is not consistent with these policies. **T3 does not promote medium density housing; it allows higher density housing and mixed use, and the allowable height and massing is not compatible with adjacent uses.**

The staff report seems to present all Traditional Neighborhood zoning as the same because the permitted uses are similar. But the allowable scale is very different from T1 to T2 and T3. T3 is most appropriate for much larger sites along major transit corridors like the one near University and Lexington. Or Opportunity Areas like the Ford site. **T3 is not appropriate for the shallow lots fronting Grand Avenue.**

The parcel at 695 Grand also does not meet the criteria established in the zoning ordinance for T3 Zoning

*Sec. 66.314. - Intent, T3 traditional neighborhood district*

*The T3 traditional neighborhood district provides for higher-density pedestrian- and transit-oriented mixed-use development. It is designed for development or redevelopment of land on sites large enough to support:*

*(a) A mix of uses, including residential, commercial, civic and open space uses in close proximity to one another.*

*(b) A mix of housing styles, types and sizes to accommodate households of varying sizes, ages and incomes.*

*(c) A system of interconnected streets and paths that offer multiple routes for motorists, pedestrians and bicyclists, and are connected to existing and future streets;*

*(d) A system of open space resources and amenities; and incorporation of environmental features into the design of the neighborhood.*

*The T3 district is also intended for smaller sites in **an existing mixed-use neighborhood center** where some of the above elements already exist, or in an area identified in the comprehensive plan as a potential "urban village" site. The above elements may be found within the T3 district or adjacent to it; the intent is that all would be present within a reasonable walking distance.*

The site at 695 Grand **does not meet** these criteria. Grand Avenue is **NOT** a high-density transit corridor. It is not an existing center. Grand Avenue is not University where there are much larger parcels to redevelop. Grand is a 2 -lane street. with a center turn lane. St Albans is a narrow, one-way residential street. The site at 695 Grand is a shallow single site. It is not adjacent to or within a larger area with open space nor is it part of a planned urban village. It is a single, existing lot wedged into a low to medium density, mixed use street with immediately adjacent lower density 2-3 story residential. **T3 zoning is not appropriate.**

### **In Conclusion**

**Rezoning to T3 and granting additional variances and a conditional use permit for even more height would not be consistent with the City's adopted 2040 Comprehensive Plan. Development to T3 higher density housing and mixed use at this site would be totally out of scale with the surrounding area.**

**I urge the Zoning Committee and Planning Commission to honor ALL the policies of the Comprehensive Plan and the criteria in the Zoning Ordinance, to consider the broader context of this parcel, and to deny this rezoning .**

Respectively submitted

Peggy Reichert

**From:** [Hillary Parsons](#)  
**To:** [Butler, Sonja \(CI-StPaul\)](#); [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#); [luiserangelmorales@gmail.com](mailto:luiserangelmorales@gmail.com); [simon.taghioff@gmail.com](mailto:simon.taghioff@gmail.com); [Noecker, Rebecca \(CI-StPaul\)](#); [\\*CI-StPaul\\_Contact-Council](#)  
**Subject:** RE: Opposition to Proposed Dixies/ 695 Grand Development Project  
**Date:** Tuesday, June 29, 2021 10:44:19 AM

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Good morning,

I live at 42 Saint Albans Street South, just across from the proposed Dixies Development. I am excited for new development along Grand, but I have never gotten a valid explanation for why T3 zoning is appropriate where a narrow one-way street connects to a non-transit corridor (Grand Avenue).

I have lived on this street for several years and witnessed several accidents at the intersection of Saint Albans and Grand. I have nearly been struck as a pedestrian on that corner at least 3 times as people zoom down. It is already extremely busy, as people use Saint Albans to get to 35E and to avoid the lights on Dale. Having a parking garage exit on Saint Albans is an insanely bad idea due to the pedestrian traffic along the street. If public safety is a concern, this project needs to be denied.

This is a money grab for the developer and the property owner. This is not a legacy project. The LAST thing this neighborhood needs is luxury housing, given attempts to increase diversity in this neighborhood and to be welcoming to all people. This will drive rents up for others in the neighborhood and make Grand inaccessible to visitors as parking will become a tight commodity. This particular area is already the DENSIST in terms of residents in the entire Summit Hill District. Adding 80 rental units to this block will overwhelm the neighborhood with traffic, noise, additional pollution, and for what????? LUXURY RENTALS????????? Seriously, this is such a narrow-minded and diversity limiting move for our neighborhood. Anyone espousing diversity should be ashamed of recommending this addition to our special neighborhood, which currently has all types of housing, including affordable apartments, and rents will likely go up further driving lower income people away.

Please do not allow this disappointing project that the city will regret for years to come.

Saint Albans is the most beautiful street in all of Saint Paul. The old row houses (I don't own or live in one of them) are pieces of history. This area is prone to sink holes. Underground parking is absolutely a mistake. I haven't seen any confirmation whatsoever even after numerous requests that they have done substrate studies and have a geological understanding of the material below that lot and whether it is suitable for underground development.

If this project is approved, it will send a message that money is more important than anything else to a neighborhood and as long as developers have deep pockets and a good PR team, they get to do whatever they please. That is not the Saint Paul I know and love.

Please listen to the people who have lived in this area for decades. We put our money where our mouth is. I shop locally, I eat locally, I support the economy on Grand. I have spent hundreds of thousands of dollars in property taxes and for food/products/etc. along Grand avenue in this

neighborhood. My neighbors, who also oppose the project, have also been here for decades and have invested their hearts and souls into their properties and to this area.

Please say no to luxury rentals. Please say no to money-hungry developers. The history and character of this neighborhood deserve much better.

Yours,

Hillary Parsons

**From:** [MARIT LEE KUCERA](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#); [luiserangelmorales@gmail.com](mailto:luiserangelmorales@gmail.com); [simon.taghioff@gmail.com](mailto:simon.taghioff@gmail.com); [Pereira, Luis \(CI-StPaul\)](#); [Butler, Sonja \(CI-StPaul\)](#); [Noecker, Rebecca \(CI-StPaul\)](#)  
**Subject:** Vote against 695 Grand Rezoning: Zoning File # 21-271-810  
**Date:** Tuesday, June 29, 2021 12:03:50 PM

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Dear Zoning Committee of the Saint Paul Planning Commission:

As a 45-year owner/resident of 30 South Saint Albans, I urge the Committee to deny the request in Zoning File # 21-271-810 to change 695 Grand from B2 to T3. I would gladly welcome, embrace, and endorse change to 695 Grand Avenue, but **not the proposed Big Box** at 695 Grand. If this project cannot be built within the current zoning regulations, including the East Grand Overlay, it is not the right project for this location.

The proposed 695 is

- too tall (60+')
- too big (footprint of 30,500 sq. ft., with a total floor area of 108,000 sq. ft., excluding parking), too deep, too wide.
- too dense (80 apartments, upwards of 150 residents) for proposed onsite parking.
  - inaccurate and deceptive to lump residential and patron parking together.
    - 70-some underground parking spaces (estimated rent: \$175/month each) will not be available to patrons of the 4 businesses
    - 20-some patron parking spaces do not begin to meet the needs of 4 businesses, which include 2-3 restaurants.
- has no provisions for employee parking or residential guest parking: plus no respect/consideration for current use of street parking by neighbors and their guests on Saint Albans and the other businesses on Grand.
- does not provide adequate transitions in size or scale to the immediate residential neighbors. East, north, west proposed walls offer sheer fortress views.
- does not enhance the neighborhood historical character.
- adds increased, unsustainable traffic to the side street of St. Albans, the designated entrance/exit for residential parking and exit for patron parking. St Albans, a very narrow one-way street from Summit to Grand, becomes a "goat trail" of icy ruts in winter.
- has no provisions for affordable housing, which Saint Paul needs. Proposed rents far exceed current average (low \$900s) in Summit Hill .
- will become the behemoth of all of Grand Avenue, leading the way for other such 5-over-1 (podium) ill-built, ill-designed, cheap structures.
  - Grand Avenue will become like Uptown In Minneapolis, devoid of its former unique character, shops, restaurants, and customers.
- last, but not least: is not well-served by transit, with only one bus route #63, along Grand itself. Service is adequate only during rush hours on week days, otherwise, only every 30 minutes. Route #65 along Dale street, connecting to downtown St. Paul and the Green Line, only runs every 30 minutes.

I reiterate: if this project cannot be built within the current zoning regulations, including the East Grand Overlay, it is not the right project for this location. Getting the biggest bang for the buck into the wallets of the property owner and developers will not restore the *Grand* to Grand Avenue with any kind of legacy to Grand Avenue or to

Saint Paul.

Please vote to deny the zoning change in Zoning File # 21-271-810 .

Thank you.

Respectfully submitted,

Marit Lee Kucera

30 Saint Albans South #5

Saint Paul, MN 55105

**From:** [nancy.ruppenthal](mailto:nancy.ruppenthal)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](mailto:*CI-StPaul_PED-ZoningCommitteeSecretary)  
**Cc:** [luiserangelmorales@gmail.com](mailto:luiserangelmorales@gmail.com); [Pereira, Luis \(CI-StPaul\)](#); [Butler, Sonja \(CI-StPaul\)](#); [Noecker, Rebecca \(CI-StPaul\)](#)  
**Subject:** Oppose 695 Grand Avenue Project -- Public Comment for July 1, 2021 meeting and all future meetings related to this project  
**Date:** Tuesday, June 29, 2021 1:04:41 PM

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**June 28, 2021**

**Hello:**

**After submitting a previous letter to the SHA/ ZLU Committee, I was assured that the extensive negative sentiment toward this development plan will not be minimized or discounted as the proposal moves to the next stage in the process. I hope that will be the case.**

**During the months of discussion and revision, the pattern that I have seen is a parade of “revisions” that incorporate most recent complaints about design deficiencies and offenses, but delete some problematic design details that had been previously accommodated.**

**One example: When concerns about utility noise were stated several months ago, the developer indicated that all utility sound was being contained inside the building.**

**In the latest design, however, the electrical utility components were placed external to the building behind a small fence on St Albans at the alley. This, and other such inconsistencies, have added to the negative sentiment toward this proposal.**

**The large contingent of critics see the process as “rearranging deck chairs on the Titanic” because the vision that supports this project is flawed and inconsistent with the values it feigns to represent. Affordable housing ... not true even without hundreds of dollars on top of rental rates for indoor parking spaces. The so-called “Dream-space” ... holding the promise of culturally diverse business opportunities when the plan, allegedly, has been for a renamed version of Dixies to occupy that space.**

**This development plan would likely be seen as an invitation to dine, shop, and live elsewhere. It is too big, too tall, too demanding of parking and traffic levels. It simply cannot be accommodated in the 695 Grand Avenue venue and, therefore, MUST NOT BE APPROVED. PLEASE!**

**I do not understand Mr. Kenefick’s aspirations to leave a negative legacy after having been a positive contributor to our neighborhood for so many years.**

**PLEASE DO NOT SUPPORT THIS PROJECT!**

**Respectfully,  
Nancy Ruppenthal  
24 St Albans South, #6  
St Paul, Mn 55105**

**From:** [Linda Makinen](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#); [luiserangelmorales@gmail.com](mailto:luiserangelmorales@gmail.com); [simon.taghioff@gmail.com](mailto:simon.taghioff@gmail.com); [Pereira, Luis \(CI-StPaul\)](#); [Butler, Sonja \(CI-StPaul\)](#); [Noecker, Rebecca \(CI-StPaul\)](#)  
**Subject:** Rezoning of 695 Grand Avenue to T-3  
**Date:** Tuesday, June 29, 2021 1:00:39 PM

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**Re: ZF# 21-271-810 695 Grand Rezoning**

Dear Zoning Committee Members of the Planning Commission:

I am writing to oppose the application submitted by Peter Kenefick and Reuter/Walton to change the zoning for this project from B2 to T3. This change is not wanted or needed by the Summit Hill Neighborhood.

- The granting of a T-3 zone to this site constitutes “**spot zoning**” which is not permitted in the zoning rules. This rezone should not be permitted because it greatly conflicts with the established East Grand Avenue Overlay District plan, and the developer has shown no hard evidence that the zoning change is required to build on this property.
- Building to the T-3 maximum height and mass and beyond, will **harm the historical character** of the immediate surroundings and ultimately of the valuable historical character of the Summit Hill neighborhood. The attempt to fit in to the neighborhood by using a few exterior materials that mimic surrounding buildings does not compensate for the gross overages of height, mass or of minimal setbacks at the neighboring street. The plan makes no real attempt to fit in with the surrounding properties. This T-3 oversized plan maximizes only for the economic enhancement of its owners.
- Allowing this property to change zoning to a T-3 will **add a level of density** to this corner, already one of the most dense in the Summit Hill neighborhood and **that the corner cannot support**. Planning for parking access, deliveries, garbage, mail and other services to the residences and businesses is totally inadequate and will cause major disruptions to parking and traffic issues for a very narrow St. Albans that is already at its parking and traffic maximum. Keeping the B-2 zoning designation would allow a building that stays within the East Grand Overlay District and would provide added density that St. Albans and the corner of St. Albans and Grand could tolerate.
- Granting a T-3 designation for this project will set **a precedent that the Summit Hill Neighborhood does not want**. The recent Neighborhood Survey shows that it does not want to change the East Grand Avenue Overlay District plans. There is a better way to accomplish the density and housing needs of the future, which can be accomplished within the zoning guidelines of the EGAOD. This behemoth building will pave the way for copycat structures along the narrow Grand Avenue that will forever change the character of the Avenue and the Summit Hill neighborhood.

The developers of this building have demonstrated that they have not done any analysis of the site, the street, the immediate neighbors or the neighborhood. This project should not be bullied through the process without actual studies of the impact this level of density will have on the livability of this corner and the whole Summit Hill Neighborhood.

I urge you, do not make the mistake of granting this zoning change. It is a change that cannot be undone.

Respectfully submitted,

Linda Makinen

24 Saint Albans St, So., Unit 1

St. Paul, MN 55105

**From:** [William Pesek](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** 695 Grand Avenue  
**Date:** Tuesday, June 29, 2021 1:59:48 PM

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I oppose the zoning application for 695 Grand Avenue, Dixies.  
A T3 is not consistent with the City's Comprehensive Plan.  
It would constitute "spot zoning"  
The building complex is too big and too tall. It's out of character with our neighborhood.  
I support the East Grand Avenues Overlay and the existing zoning rules.

Thank you for representing my reactions to this 695 Proposal. I own my house  
and have lived in this neighborhood for 30 years.

William Pesek  
769 Lincoln Avenue  
Saint Paul, Mn 55105

**From:** [Mmo](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Opposition to 695 grand ave rezoning  
**Date:** Tuesday, June 29, 2021 3:06:37 PM

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I oppose the current to rezoning of the Dixie's property. The height and foot print is too large. The building design is not in character with our neighborhood.

Thank you  
Meridith O'Toole  
773 Lincoln 55105

Sent from my iPhone

June 29, 2021

St. Paul Zoning Committee  
25 West 4th Street, Suite 1400  
St Paul, MN 55102

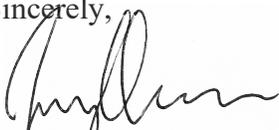
Dear Zoning Committee Members,

I am writing regarding the 695 Grand Avenue Development and Rezoning/CUP/Variance request to communicate my opposition to the plans and proposal as submitted.

My wife Whitney, son Calvin, and I were drawn to this neighborhood because of the blend of city culture and amenities with historical charm and scale. The current plans as submitted by the developer do not respect the historical nature or scale of this historic district and prioritize profitability of the business plan over compliance with the rules and regulations of this great city. The build height and scale are out of place in this neighborhood and threaten to irrevocable damage neighbors quality of life and infringe upon our rights . The shadow studies clearly show that the planned structure without setback or transitioning to neighboring residential scale as required under the established zoning requirements would cast my family home in shadows for a majority of the year.

I call upon the committee to protect and respect the rights of the neighbors and historic neighborhood and to reject these Rezoning and Variance requests.

Sincerely,



Jeremy Ordemann

**Jeremy D. Ordemann**  
27 St Albans St S. #7  
St Paul, MN 55105  
+1-507-469-8194  
jeremy.ordemann@gmail.com

## Langer, Samantha (CI-StPaul)

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**From:** Susan St John <privateartmn@gmail.com>  
**Sent:** Tuesday, June 29, 2021 1:42 PM  
**To:** \*CI-StPaul\_PED-ZoningCommitteeSecretary  
**Subject:** Copy of the presentation by Susan St John for the Zoning Committee Meeting on July 1 at 3:30 PM respectfully submitted.

Please find below a draft of my comments for the Zoning Committee Meeting scheduled for July 1st at 3:30PM

Inbox



My name is **Susan St John and I live at 25 St Albans St S**, in a multifamily building. My block is 100% multifamily. We support multifamily housing, and we want more housing, especially affordable housing, but I am here to **present a petition against this development as proposed for 695 Grand/Dixies**.

I am here to **present a petition** that has been **collected by volunteers** in a short time, starting a few days after the application for 695 Grand/Dixies was filed.

These **signatures were gathered in person**, still during a pandemic, starting with a heatwave with 90+° temperatures and progressing into the rainy weather of the last week. This was **100% volunteer effort and the signatures are 100% from the actual community — real people who know and value Grand Avenue and the Summit Hill neighborhood**.

Neighbors and Grand Ave supporters were reached by **walking the neighborhood**. The vast majority of the **signatures were collected on the sidewalks of Grand Avenue** and neighboring streets, from the people who were walking by. Another large portion were **collected by popping into Grand Avenue businesses**, and from the porches of residents. These signatures are from **people who visit Grand Avenue, who live near Grand Avenue, and who care deeply about grand Avenue and its success**.

The petition reads:

**A Better Way for Grand Avenue in Saint Paul**

***We oppose the 695 Grand/Dixies project proposal—which violates all existing zoning codes. We oppose the proposed rezoning, conditional use permit, and all modifications and exceptions to current zoning. WE support a better way for those who live, visit, shop, eat, walk, and bike on Grand Avenue.***

***I support a balanced, mixed-use project that meets current zoning regulations, with no variances or other zoning exceptions.***

**This petition has [over 400] signatures**

They are from:

**[185] residents.** This includes renters both on and off Grand Ave. This includes homeowners in condos and houses.

**[153] shoppers and visitors.** Again, these are from actual Grand Avenue pedestrians who were walking along the Avenue and neighborhood streets, and were willing to stop and chat. Many of these signers are in nearby Summit-University, and they see Grand as their neighborhood street despite the district council borders.

Finally,

**{63} bus[iness owners and employees]** signed the petition. They oppose this project because they think it will harm Grand Avenue, and harm their businesses and their jobs.

\*\*\*\*\*note — I will give you updated numbers — I am expecting more sheets to be turned in

We tried to present this petition to the **Summit Hill Association** before their vote on June 17th, but we were **not allowed**. That vote by the SHA board was NOT representative of the majority of Summit Hill residents. This petition, as well as the considerable public comment received by the SHA and now the planning commission, show that the community overwhelmingly opposes the scale and intensity and details of this project as proposed. **The Developers did not listen to the community.**

In closing, this petition represents the people who are on Grand every day. It represents the people who have chosen to make their homes here, who have chosen to work or create businesses here, who have chosen to spend their time and money on Grand. **We asked why they liked Grand**

**Avenue. Historic charm, safe for walking, great local businesses, accessible scale. Everyone supported the idea of a mixed use building on this site, but opposed the scale and intensity of this proposal.**

--

Private Art | Susan St. John  
25 St. Albans St. South  
Saint Paul, MN 55105  
T: 651-227-1449  
M: 651-491-4431  
[privateartmn@gmail.com](mailto:privateartmn@gmail.com)

 ReplyForward

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Private Art | Susan St. John  
25 St. Albans St. South  
Saint Paul, MN 55105  
T: 651-227-1449  
M: 651-491-4431  
[privateartmn@gmail.com](mailto:privateartmn@gmail.com)

**From:** [Katherine Hayes](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Zoning application for 695 Grand/Dixies  
**Date:** Tuesday, June 29, 2021 6:52:41 PM

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To Whom It May Concern,

I oppose the zoning application for 695 Grand/Dixies.

I am a resident of the neighborhood and have strong feelings in opposition to granting an exception to the current zoning rules for this purpose. It appears to me the only upside for an exception would be to the developers and owners. A development in compliance with the existing zoning rules would be welcomed.

Please do not grant an exception in this case.

Sincerely,  
Katherine Hayes  
807 Fairmount Ave.

Sent from my iPhone

## Langer, Samantha (CI-StPaul)

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**From:** S Mason <sonjalmason@gmail.com>  
**Sent:** Tuesday, June 29, 2021 7:07 PM  
**To:** \*CI-StPaul\_PED-ZoningCommitteeSecretary  
**Subject:** Public comment: OPPOSITION TO 695 GRAND PROPOSAL, SUPPORT FOR "MISSING MIDDLE" NEIGHBORHOOD DENSITY

Planning Commissioners,

I wanted to express my **strong opposition** to the **rezoning, conditional use permit, and variances** for the proposal for Dixies/695 Grand.

“Many cities over the past couple decades have introduced strategies, policies, and zoning to allow higher-intensity development, often transit-oriented, along their major corridors. The result has often been awkward, with five-plus-story buildings abutting single family homes, **which usually results in an outcry from adjacent neighborhoods**. Applying Missing Middle Housing is a great way to transition from these corridors into lower-scale neighborhoods.” -Daniel Parolek. *Missing Middle Housing*

This sounds all too familiar—outcry against too-big-too-tall-and-overly-encroaching proposals echo from neighbors all over St Paul these days. We need to embrace MMH for our neighborhoods and neighborhood main streets, like Grand Avenue. This will allow us to meet our Met Council goals to add more housing **and** preserve the character of St Paul’s many cherished neighborhoods.

I, like many neighbors, business owners and employees, and Grand visitors, object to the **scale, site planning, and intensity** of the proposal for Dixies/695 Grand. I want to emphasize that a mixed use commercial-residential at this location is appropriate, and even more importantly to this application, **a mixed use project is an allowed land use under current zoning**. Rezoning is not necessary. In fact, the entirety of the rezoning (etc) request is to increase the scale and intensity of the project.

The proposed intensity of this project is entirely beyond what the site and neighborhood context can support, and would have hugely detrimental implications. It is the desired large bulk of the building driving the application to leap past all zoning limits, and swell beyond the existing scale of the physical context. The tall height, minimal setbacks and poorly placed “stepbacks”, intense lot coverage, and backwards solar orientation cause it to encroach on privacy and cast shadows far in excess of the established norms, which will prevent the reasonable enjoyment of property by adjacent landowners. All of these adverse impacts are expressly caused by the increased intensity and building bulk that is being sought through rezoning, conditional use permits, and variances.

I would like to present the concept **Missing Middle Housing**, a planning concept cited and supported by the 2040 Comp Plan (p138). MMH is an appropriate lens to understand the level of intensity that would be appropriate to this site, and to the neighborhood. A scale that would support walkability, vibrant local businesses on Grand, and the retention and enhancement of our existing affordable housing supply and the economic diversity.

MISSING MIDDLE HOUSING & SENSITIVITY TO CONTEXT

Missing Middle is defined as “house scale buildings with multiple units.” At its essence it is concerned the *scale of buildings*, not their *land use*. **Daniel Parolek *Missing Middle* concepts can, should, and must be applied to our neighborhood mixed use corridors, like Grand Avenue.**

Major corridors —University, Snelling, W. Seventh (“major arterials” and state highways) —are wider and have a different character than smaller neighborhood main streets (“minor arterials”) like Grand Ave. Major corridors have the highest existing and planned transit use and are where, per LU-1, the majority of density and growth should be directed. And yet, this project on a minor neighborhood arterial has higher intensity (by lot size) than most projects along University ([a](#)). T3 zoning exists at major intersections, like Dale and University, transitioning to lower intensity T2 at intersections with neighborhood side streets. In fact, even transit stop corner Victoria Station (intersection of University and minor arterial Victoria) is zoned T2.

[MMH](#) is focused on "Neighborhood Living, Not City Living":

"... many people prefer neighborhood living rather than city living, and five-plus-story buildings are too large for most neighborhoods. Missing Middle Housing is perfectly scaled to provide additional housing that fits in with the neighborhood character."

While Missing Middle Housing is indeed specifically about *housing*, it is not only about *stand alone* housing. Mixed use buildings are housing, too. Opticos calls them “live/work,” but the images below ([from MMH website](#)) illustrate the traditional housing-over-storefront-retail building typology we have along Grand, rather than an artist's studio —which I think is what many people imagine with the phrase *live/work*.

One page 261 of the *Missing Middle* book, Daniel Parolek introduces what he calls “Upper Missing Middle.” It calls for a maximum height of 3-4 stories, paired with limits on building widths and lengths. This is this MM type that is applicable to this site. He cautions:

#### MISSING MIDDLE CONCEPTS & ST PAUL'S ZONING CODE

In terms of St Paul districts, the zoning districts land use is specified by the letter and the intensity by the number. The “Level 2's” are districts for neighborhood scale intensity: B2 “Community Business” (current zoning) and T2 (whose standards apply to this site thanks to the EG overlay). "The T2 traditional neighborhood district is designed for use in existing or potential pedestrian and transit nodes" 66.313. These are the appropriate top zoning for minor three-lane minor arterial streets like Grand Avenue. These districts are supported by the Summit Hill Plan (G5 G7 H7 H9), the EG Overlay itself, and by the 2040 Comp Plan, most specifically LU-29, LU-36 and H-47, which all emphasize compatibility in scale and sensitivity to context. The Level 3's are meant for major arterial locations. B3, is "general business district is intended to provide sites for more diversified types of businesses than those in the B1 and B2 business districts, and is intended for use along major traffic arteries or adjacent to community business districts"; similarly, "The T3 traditional neighborhood district provides for higher-density pedestrian- and transit-oriented mixed-use development" 66.314. B2 and T2 are appropriate zoning categories for this site.

#### MISSING MIDDLE CONCEPTS & THE EG OVERLAY

The recommendations from Parolek's book actually sound a lot like what the EG overlay prescribes. MMH Upper Missing Middle: a maximum height of 3-4 stories, building widths 65-85 ft., building depth “deeper than missing middle zones”;

and it notes that this deeper depth is the primary difference between UMM and MM. EG limits: max height 3-stories, max foot print 25,000 and total building size 75,000. EG also applies design standards from Traditional Neighborhood districts (the T2 standards). One notable difference between MMH and EG, the EG overlay allows a larger footprint in concession to contemporary building norms, specifically parking garage podium standards. This is an incremental increase designed into the overlay to allow for modern construction practices while still respecting the spirit of the scale of the historic middle housing and mixed use.

[Incremental change](#) is an important component of MMH. At 1.7 the height of the tallest neighbors and 3.5 times the largest footprint neighbors, and 2.0 times the total square footage allowed by the EG overlay, the **departure from established norms by this proposal is monumental, not incremental**. In contrast, the 25,000 SF footprint permitted under EG represents an incremental increase from historic patterns. Moreover, this incremental increase is carefully managed by Traditional Neighborhood site planning design standards. These same design standards ostensibly apply to this proposal, but they are not being met. Most egregiously, residential transitions and attention to solar orientation—including prescriptive anti-shadow provisions requiring supplemental height limits and setbacks—are not met.

### MISSING MIDDLE CONCEPTS & “JUST RIGHT” DENSITY

St Paul Comp Plan Appendix B gives a range of “target densities” for new projects of 20-75 units per acre along mixed use areas. It should be noted that this range is for all mixed use areas: which include primary corridors like University and Snelling and W 7th, as well as secondary neighborhood arterials like Grand, Payne, East Third, and Arcade. It stands to reason smaller streets should have the lower end of the range, and the wider, regional feeder corridor should reflect the higher end of the range. The same hold true for Neighborhood nodes; Snelling and University is a node as is Grand and Victoria, but the two nodes should have substantially different target densities. Finally, I wanted to note that Missing Middle does specify a “[goldilocks](#)” density of 30-50 units per acre (3); the lower end of St Paul’s “target density” would land in the MMH range. A *Guardian* article describes it as:

... the Goldilocks density: dense enough to support vibrant main streets with retail and services for local needs, but not too high that people can't take the stairs in a pinch. Dense enough to support bike and transit infrastructure, but not so dense to need subways and huge underground parking garages. Dense enough to build a sense of community, but not so dense as to have everyone slip into anonymity. (4)

An EG overlay compliant design would land exactly in 30-50 range, while the additional intensity requested would push this proposal far beyond it. It warrants observation that the expressed “goldilocks” range is residential density only, without consideration of the added intensity from the retail component. It stands to reason that the commercial portion of a mixed use project would result in a commensurate reduction in housing unit density to stay within the goldilocks range. The proposal has a dwelling unit density closer to 100, double “goldilocks,” plus the additional intensity from the retail. The lack of attention to neighborhood context shown by this proposal is even more frustrating to those of us living in MMH, because the example of what to do is quite literally right in front (and behind, and on the side) of this property. Context matters.

In Summit Hill, we are fortunate to have examples of “goldilocks” density, especially in the “Grandendale Node,” (a) which includes this block of St Albans Street South. This walkable, approachable density is accomplished through buildings with a range of heights (two-story, two-and-half story, three-story, and three-story-plus-garden-level) and with small and medium footprints. This mix of housing options in turn creates walkability and supports a variety of households at different income levels, two highly valued and defining characteristics of the Summit Hill neighborhood.

### MISSING MIDDLE CONCEPTS & AFFORDABILITY

We want more housing, and especially more affordable housing, in St Paul. Missing Middle concepts are the best way to accomplish that.

The "affordable-by-design" component of Missing Middle (1) (2) bears mention, as it is in sharp contrast to this proposal for a luxury-priced rental community. Design decisions have been made in order to charge higher rents (9+ foot ceilings, luxury amenities like club and exercise rooms; why does the retail parking need to be costly structured parking? ) which then have increased the building bulk. Allowing this project to rewrite the all the zoning rules for "market rate" apartments (with rents that start at \$1400 for a studio/alcove apartment ) creates an anti-incentive AGAINST affordable housing. Moreover, studies have shown that luxury-priced housing causes displacement and rent increases in

## CONCLUSIONS

The planning commission should deny this request.

T3 is incompatible with the Summit Hill Plan, incompatible with the existing EG overlay zoning, and incompatible with the St Paul Comp Plan. Granting this rezoning to T3 would be capricious and arbitrary.

The proposed land use of "mixed use" is currently allowed, rezoning is **not** necessary to make a reasonable use of this property. Planning goals cited in the Staff report (particularly LU-35) could be met, and would be better met, with a smaller scale project on this site. A mixed use project at smaller scale and intensity would meet LU-35, and, unlike the current proposal, would also meet LU-34, LU-36, LU-27 and H-47—which all underscore the importance of scale, compatibility and sensitivity.

It is only the economic interests of the landowner that drive the request for a larger, more intense building. Granting this rezoning to intensify this site only would be contrary to the public interest and damaging to the rights of other persons and property values in the neighborhood. Moreover, granting this application would amount to securing for the applicant economic benefits and rights that are NOT enjoyed by other owners in the same area, who are subject to EG overlay requirements as well as HPC limitations on their properties. The severe encroachment caused by reducing the protections offered by the current zoning district standards will damage neighboring property value and reduce reasonable enjoyment.

Thank you again for your time in reading my letter, and for your work for the residents of St Paul.

Sincerely, Sonja Mason

St Albans St S  
St Paul Resident & Small Business Owner

## Addendum: references and images

summit hill plan

G5 Neighborhood Focus for Commercial Uses. **B2 and BC zoning allows uses most appropriate to commercial activity on Grand Avenue.** Additional B3 uses are not appropriate for Grand Avenue. A zoning study should be initiated by the City to rezone B3 parcels that are currently used for B2 or less intensive uses

G6 Commercial Spillover. **Rezoning and variances are opposed by SHA in those areas where parking and traffic** problems create undue hardship for neighboring businesses, residents, and visitors. To help reduce commercial spillover effects on nearby property owners, the approval of site plans and licenses will include efforts to mitigate parking and traffic problems that are of serious concern to immediately affected businesses and residents

H7 Housing Density. **Ensure that the impact of any increased density conforms to zoning and building requirements**, and that the City considers the development's adverse impact on existing municipal services including, but not limited to, traffic and parking.

H9 Mixed-Use Buildings (Commercial Plus Residential). Ensure that new and renovated mixed-use buildings on Grand Avenue **respect the historic nature and character of the neighborhood**, as well as providing dedicated off-street or underground parking for residents and tenants.

H12 Housing Options. Maintain rental housing options to continue some measure of **affordability** in the neighborhood

saint paul 2040 comp plan

Policy LU-1. Encourage transit-supportive density and **direct the majority of growth to areas with the highest existing or planned transit capacity.**

Policy LU-29. **Ensure that building massing, height, scale and design transition** to those permitted in adjoining districts.

Policy LU-34. Provide for medium-density housing that diversifies housing options, such as townhouses, courtyard apartments and smaller multi-family developments, **compatible with the general scale of Urban Neighborhoods.**

Policy LU-35. Provide for multi-family housing along arterial and collector streets, and in employment centers to facilitate walking and leverage the use of public transportation

Policy LU-36. Promote neighborhood serving commercial businesses within Urban Neighborhoods that are **compatible with the character and scale of the existing residential development.**

Policy H-47. Encourage high-quality urban design for residential development that is **sensitive to context**, but also allows for innovation and consideration of market needs.

Page 138 in the Housing section specifically references "Missing Middle"

(a) Please see "Missing Middle" slide show submitted to Summit Hill Association  
[https://drive.google.com/drive/folders/1KQ\\_HrAIXmkFxcNNLNgLVy3hP-hoe74Db](https://drive.google.com/drive/folders/1KQ_HrAIXmkFxcNNLNgLVy3hP-hoe74Db)

It explains the Grandendale node, includes more analysis of the 695 Grand the site, as well as of the project design as submitted in March. Of note: The June design is 3.5 ft taller. It also has an example of the Hamline Station T3 project on University ; it is less intense with a shorter height, less lot coverage, much larger setbacks than this proposal. Hamline Station is just one example, there are several other recent projects with less intensity along University. Finally, there is an analysis of sensitive site planning by recent projects.

Missing Middle Images

## Gallery of Live/Work





SUBSIDIZE



Links in notes

[MMH](https://missingmiddlehousing.com/the-missing-middle-affordable-housing-solution/)

<https://missingmiddlehousing.com/types/live-work>

<https://www.inquirer.com/real-estate/housing/missing-middle-housing-daniel-parolek-duplex-fourplex-20200905.html>

<https://www.planetizen.com/node/46877>

<https://www.incrementaldevelopment.org/>

<https://www.theguardian.com/lifeandstyle/2014/apr/16/cities-need-goldilocks-housing-density-not-too-high-low-just-right>

<https://shelterforce.org/2018/11/05/heres-what-we-actually-know-about-market-rate-housing-development-and-displacement/>

<https://inequality.org/research/luxury-development-making-housing-crisis-worse/>

<https://drum.lib.umd.edu/bitstream/handle/1903/4205/umi-umd-4016.pdf;sequence=1>

**From:** [qwerty](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Re: i would like to share a video that is 4.35 min long.  
**Date:** Wednesday, June 30, 2021 2:05:38 AM  
**Attachments:** [Dixies-695-Grand-&Alternative-reduced.pdf](#)

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Dear Planning Commissioner:

Attached please find the pdf file I would like to submit to public comment. An earlier version of this was submitted as public comment to the Summit Hill Association, on three occasions, but it was not admitted to the public record. An earlier version of this as a video was also shared with the development team and this commission. As you will not allow the video to be shown I am submitting the attached PDF that shows the 695 proposal within the context of the neighborhood as still images. There is also an alternative design that has 47-54 units with 43 surface parking spaces and 72 underground parking spaces and has garnered support from many in opposition to the Dixies/Kenefick proposal.

The current version has been adjusted to match the plans and elevations that were submitted to the city on June 3. These images are true in scale and proportion to the design being submitted and the buildings in the immediate context. This new model reflects the increase in height that was added to the building as well as the minor adjustments to the configuration of the building mass such as balcony projections.

These images were made to show what the developers Reuter Walton, and the architects ESG and the landowner Peter Kenifick were trying to hide from being viewed. These developers are proposing a monster. The documents shows the full size and scale of this building in context. Notably, images provided by the developer never show the entire building nor do they show it in relation to the neighboring structures. These documents shows how massively out of scale this design is compared to the neighborhood.

At the halfway point, there is an alternative design. This design was presented in the spirit of compromise (it is four stories, not three) and has been presented to the developer team. Notably, this compromise design follows the spirit of traditional neighborhood design standards: particularly the required height limits, step downs and setbacks, solar orientation, and residential transitions.

The response I received from the developer was that the alternative design would be economically “unfeasible.” Indeed, the only rationale provided against every objection and criticism raised has been economic feasibility. Yet, the developer has never shown any numbers to support this claim. Moreover, economic feasibility and developer profit is not a listed as a criteria for rezoning. Economic feasibility and developer profits is not a condition for a conditional use permit. Economic feasibility and developer profits is not one of the required factors for variances.

The design is a worst case scenario of aggressive/ violent development that might happen to any site. This project will harm the property values of the neighboring structure. So negative tax values..are to be expected. The saddest part of this is we all want development to happen, but this design is a shot across the bow. They intend to strip the code of any say on what can get built. I thought we lived by rules and laws designed to produce fair and just outcomes.

The Summit Hill vote did not reflect the neighborhood opposition. The board is supposed to represent, as evidenced by the official public comment received (58% opposed), the feedback from the meetings (overwhelmingly critical), or the strong support for the Overlay shown in the recent survey. The changes do not begin to comply with Traditional Neighborhood design standards, and violate the intent and spirit of the EG overlay

The Dixies proposal is not architecture for a site but more a financial product designed to enrich a select few developers .We want architecture that is designed like people matter.

On Tue, Jun 29, 2021 at 5:11 PM qwerty <[jonmason659@gmail.com](mailto:jonmason659@gmail.com)> wrote:

This is a public meeting...we are sharing with the committee and the public. If the developers are allowed to use visual aids it is only fair that we are allowed to counter their projections in kind. I don't frankly trust that anyone has viewed the video. I feel your strict meeting structure is a means to stifle speech.

On Tue, Jun 29, 2021 at 4:33 PM \*CI-StPaul\_PED-ZoningCommitteeSecretary <[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)> wrote:

Hi Jon-

The Committee has already reviewed the video and they will be moving forward with only taking two minutes of testimony at tomorrow's meeting. The Chair of the Committee has instructed us in this way due to the large amount of public testimony we are expecting, and it is consistent with Committee public hearing rules.

Also, the meeting will be through Microsoft Teams, not Zoom, and the information to join in the meeting will be posted on our [website](#). Please let me know if you have any other questions.

Samantha

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**From:** qwerty <[jonmason659@gmail.com](mailto:jonmason659@gmail.com)>  
**Sent:** Tuesday, June 29, 2021 10:46 AM  
**To:** \*CI-StPaul\_PED-ZoningCommitteeSecretary <[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)>  
**Subject:** Re: i would like to share a video that is 4.35 min long.

How will viewing the video work with the zoom structure?

On Tue, Jun 29, 2021 at 10:23 AM \*CI-StPaul\_PED-ZoningCommitteeSecretary <[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)>

[ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:ZoningCommitteeSecretary@ci.stpaul.mn.us)> wrote:

Hi –

I have forwarded the email to our staff that will be participating in the meeting as well.  
Thank you.

Samantha

---

**From:** qwerty <[jonmason659@gmail.com](mailto:jonmason659@gmail.com)>  
**Sent:** Tuesday, June 29, 2021 10:07 AM  
**To:** \*CI-StPaul\_PED-ZoningCommitteeSecretary <[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)>  
**Subject:** i would like to share a video that is 4.35 min long.

We made a 3d model of the 695 Grand Ave project using the developers scaled plans as well as scaled the building context. A full scale site model is the best way to see and compare the scale of this proposal in relation to the existing neighborhood. We then made a video to show the project and explain the conflicts we have with the design as well as constructive suggestions for improvement. I have sent each committee member a link to the youtube post. The direct link to the video is below as well as to the youtube link.

 [695 Grand Ave Development.mp4](#)

<https://www.youtube.com/watch?v=za7YMzu02W8&t=26s>

Thank You.

Jon Mason- Resident, St. Albans St. S .

This video is a response to  
the proposed development  
at Dixies/695 Grand Ave.

The white form is a true to scale representation of the proposed building.





The 3d model was built by a professional model maker using the developer's published plans.



The adjacent buildings were measured and modelled true to scale.

Play (k)

0:22 / 4:39

HD



The building ignores the East Grand Overlay District zoning requirements.

No effort to transition or blend to residential neighbors.



Building is 1.7x taller than allowed, but still has a one-story building expression on Grand (which is discouraged by Traditional Neighborhood design standards.).



Building is 1.7x taller than allowed, but still has a one-story building expression on Grand (which is discouraged by Traditional Neighborhood design standards.).

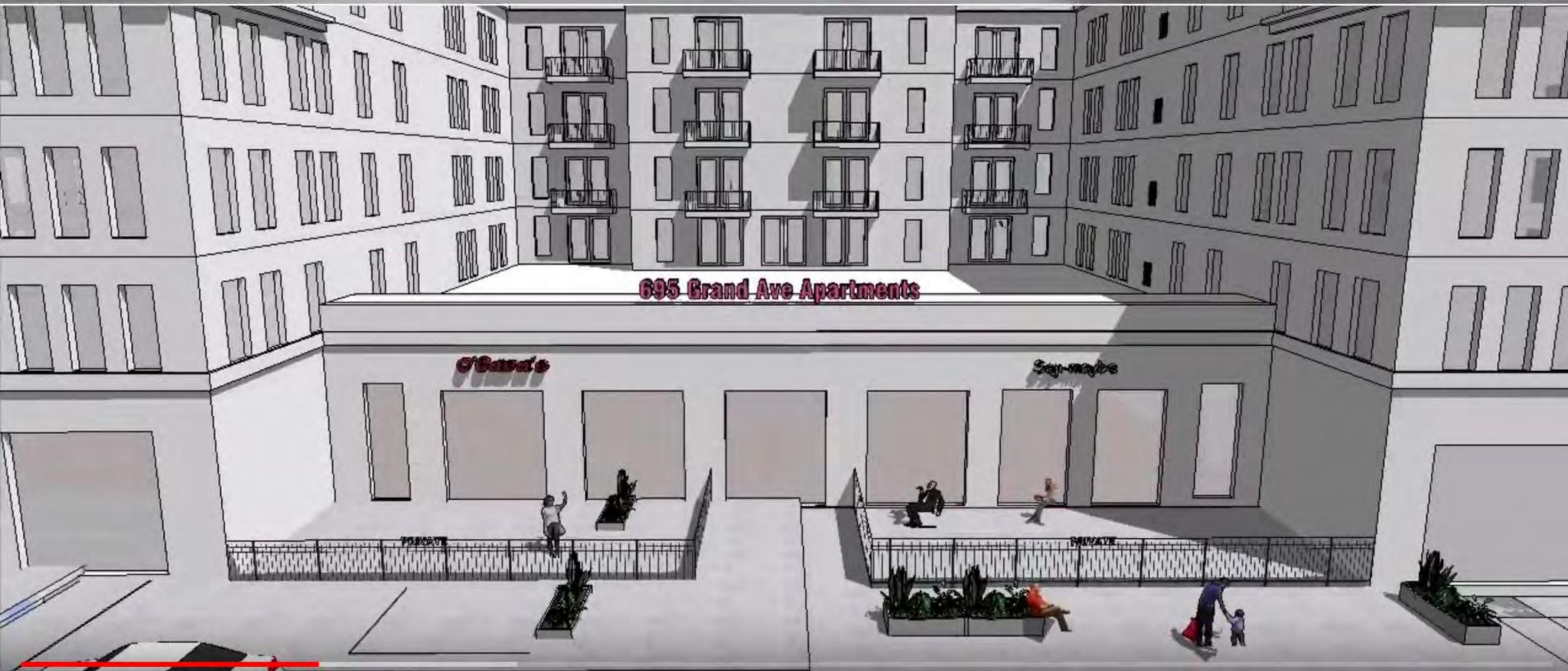


695 Grand Ave Apartments

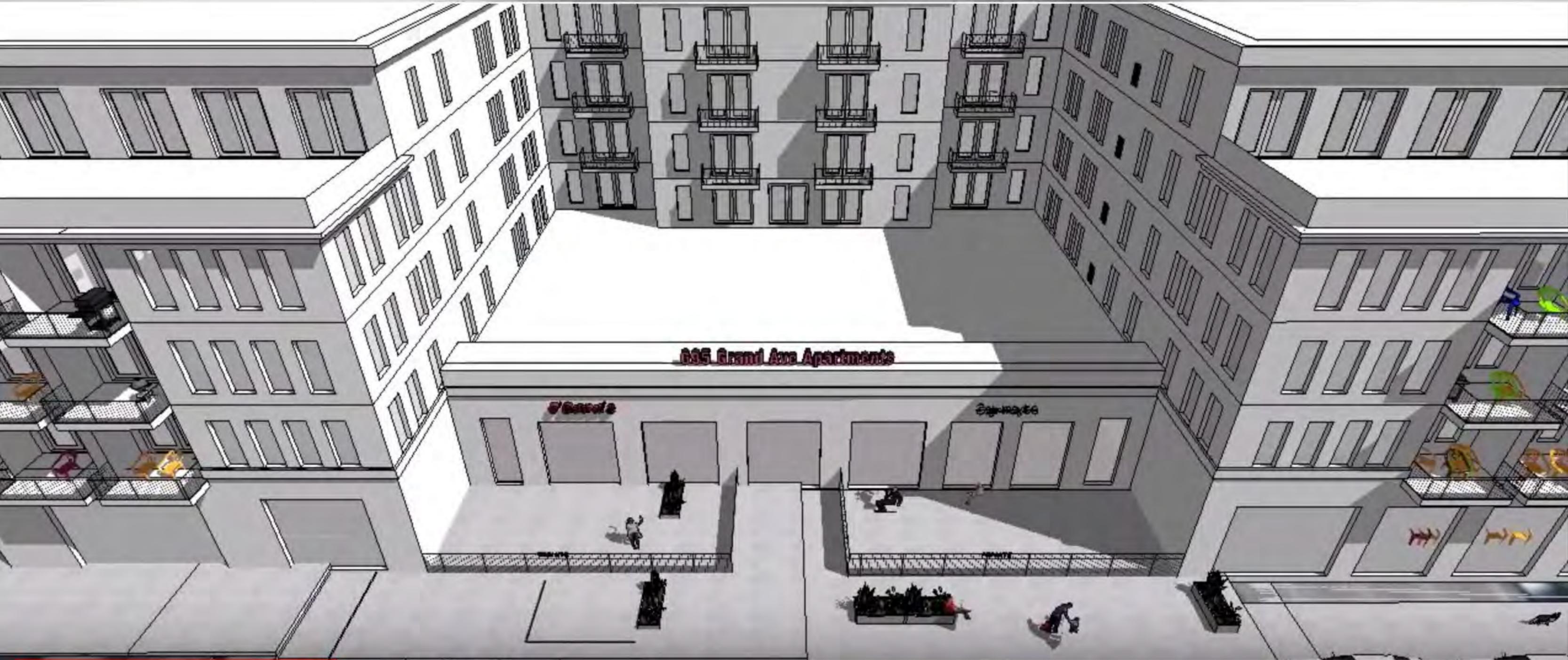
Pizzeria

Sap-...

# Private space is not public "open space".



Alcohol served = fence.



"Junkspace is like being  
condemned to a perpetual  
Jacuzzi with millions of your  
best friends." -Rem Koolhaas



# Dangerous blind exit.

TEMPORARY PARKING ENTRANCE ONLY  
ALL OTHERS EXIT ONLY

WITHDRAW  
GAS  
CARTAGE

WARNING  
CAR  
ENTERING



Disregards the St Albans  
Street setback.  
No meaningful effort to  
transition heights.





Largest building bulk is along the North, closest to residential neighbors.



64 ' tall wall x 230' wide,  
with balconies projecting beyond the building edge

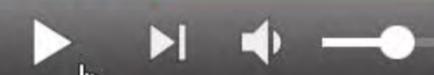
No meaningful effort to transition heights or provide setbacks to alley.  
No sun in winter = ice alley glacier. Hazardous.



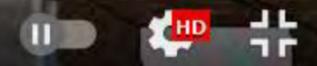


Dec. 21 noon.

Play (k)



2:05 / 4:39





The following concept was developed with Missing Middle scale, but  
also with the spirit of compromise toward the Dixie's proposal

▶ ▶ 🔊 2:23 / 4:39





This is an alternative design for 695 Grand Ave.



Match setbacks  
from Grand Ave.



Match setbacks  
from Grand Ave.

Designed to look like multiple buildings.  
Heights step down with the natural hill



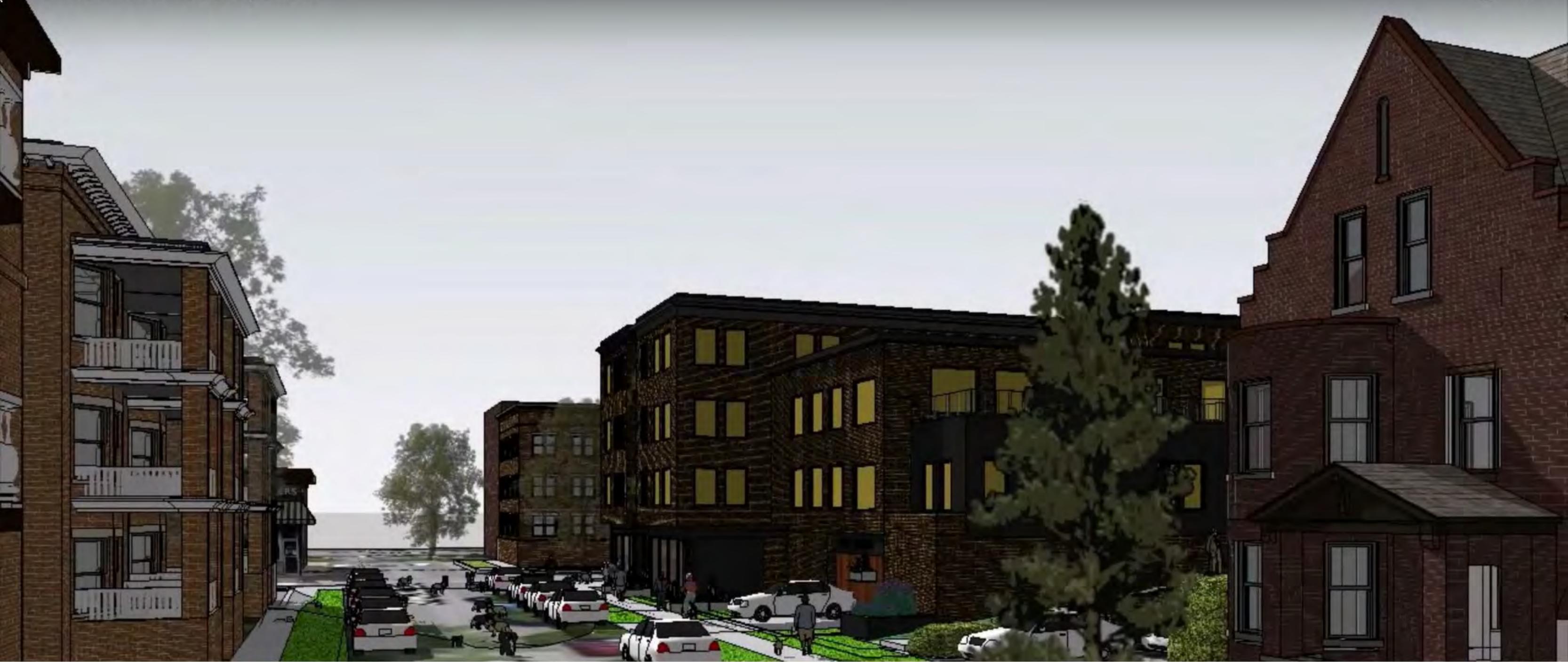
The building connects to St. Albans  
with complimentary proportions in height and width





# Building steps down and back.





Vehicle exit is set back from sidewalk a full car length for safety.



Residential  
Transitions:  
12/21 Winter  
solstice max  
shadows: sunlight  
still reaches  
neighbor's 1st level  
windows at noon.



Higher density at compatible neighborhood scale.  
This is Missing Middle.



The placement of the building creates open space with sunlight.

Courtyard over covered parking is accessible from street, creating a park-like space for yoga, art classes, play area or dog exercise.

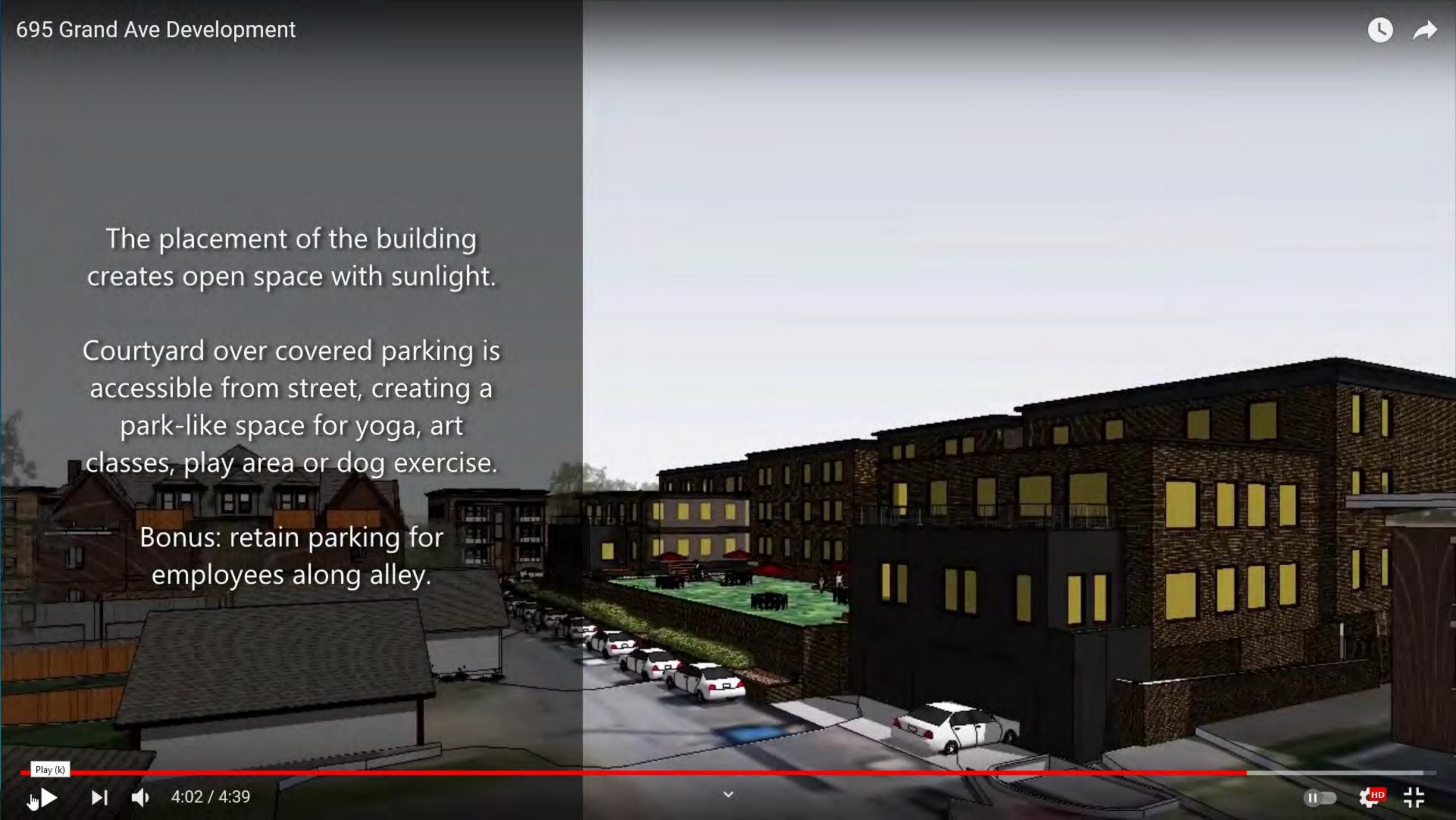
Bonus: retain parking for employees along alley.



The placement of the building creates open space with sunlight.

Courtyard over covered parking is accessible from street, creating a park-like space for yoga, art classes, play area or dog exercise.

Bonus: retain parking for employees along alley.



Careful attention to solar impacts through height transitions and building placement mitigate adverse impacts on neighbors







More housing. Compatible neighborhood scale. This is Missing Middle.

Prepared by  
Friends of A Better  
Way St Paul

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW: 695 Grand Ave project  
**Date:** Wednesday, June 30, 2021 8:11:49 AM

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**From:** Kevin Peterson <peter223@umn.edu>  
**Sent:** Tuesday, June 29, 2021 5:18 PM  
**To:** Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
**Subject:** 695 Grand Ave project

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

Dear Zoning Committee,

As a long term resident of the Summit Hill area, I am adamantly opposed to the zoning alterations being requested for the proposed building at 695 Grand Ave. I own a home two blocks from Dixie's, and am dedicated to the advancement and growth of the Summit Hill neighborhood. Although I would normally support additional commercial property development, I can't support this proposal. The proposed building is TOO BIG, and TOO TALL. It is blind to the character of our neighborhood. It looks better designed for Snelling Ave or Old Fort Road. The proposed structure ignores the existing zoning restrictions, and would dominate this end of Grand. This would not build Grand Ave. Instead, the structure seeks multiple exemptions to the zoning restrictions created to preserve the Grand Ave character. To squeeze out the last few dollars, the developer sacrifices Saint Paul's last historically important destination neighborhood. This is a building more suited to University Ave, not Grand Ave! Make it smaller. Make it fit.

Kevin Peterson  
*Kevin A. Peterson*  
*768 Goodrich Ave*  
*St Paul, MN 55105*

**From:** [privateartmn](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary; brianwenger24@gmail.com](#)  
**Subject:** FW:  
**Date:** Wednesday, June 30, 2021 8:15:31 AM

---

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: privateartmn <privateartmn@gmail.com>  
Date: 6/30/21 8:11 AM (GMT-06:00)  
To: LORI BROSTROM <lbrostrom@comcast.net>  
Subject: FW:

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: privateartmn <privateartmn@gmail.com>  
Date: 6/30/21 8:08 AM (GMT-06:00)  
To: grtodd@comcast.net  
Subject: FW:

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: privateartmn <privateartmn@gmail.com>  
Date: 6/28/21 12:04 PM (GMT-06:00)  
To: rebecca.noecker@ci.stpaul.mn.us  
Subject:

Sent from my Verizon, Samsung Galaxy smartphone

----- Original message -----

From: privateartmn <privateartmn@gmail.com>

Date: 6/28/21 11:08 AM (GMT-06:00)

To: rebecca.noecker@ci.stpaul.mn.us

Subject:

Please find the letter below outlining our neighborhood protest of the development plans for 695 Grand Avenue and the implications of this kind of development for the future of Grand Avenue as a vibrant neighborhood and small business center in St Paul.

With personal views.:

The unprofessional treatment and the skewed outgoing public notices and statements and pre-planned decisions that we--protesting neighbor/residents- have witnessed and received from the leadership of the SHA are not representative and do not reflect the overall views of the majority of Summit and Crocus Hill residents.

This is disturbing. We have documented and recorded this leadership bias and observed ongoing unprofessional action re this project as we support and advocate for the missing middle and appropriate scale n the proposed development.

As citizens of Saint Paul and friends promoting and supporting this beautiful city and its authentic quality of life, we expect and deserve and need unbiased representation and unbiased, in depth professional study undergirding the planning and decionmaking regarding zoning and land use decisions for this very important part of Saint Paul and all of the city. Its future livability and and timeless value are at stake. This is critical for all of us as change is in the forefront for America's cities and our future.

Respectfully submitted as citizen neighbor and business owner....

Susan St John,

privateartmn@gmail.com

651.491.4431

25 South St Albans Street

Saint Paul

To: Peter Kenefick

VIA EMAIL

cc Summit Hill Association, Ari Parritz

RE: 695 Grand Proposaler below

We are writing to express our objection to the complete disregard you have shown for feedback from the neighbors. We expressed concern regarding the scale of the project, and you have returned with an **even taller building**. You **increased the ceiling heights on the main floor and**

**for the penthouse**, so now the building height is 59' -10" instead of 56'-8" to the top of the fifth floor roof). The first floor does not adjust for the hill, so the height at the corner of Grand and St Albans the building will be 3'-6" higher, rising 64'-4" from the sidewalk, just a person's height (5'-8") shy of **double the height limit**. We would welcome a mixed use development that would enhance Grand Avenue and Summit Hill, but this **proposal will severely alter the essential character and damage the livability, and harm the property values, and the locally designated historic district located across the alley**. Moreover, there are no practical difficulties preventing compliance with the zoning code. There are no unique circumstances or hardships caused by this large, evenly sloped parcel. This proposal is clearly and grossly **out of scale for the size of the lot and its location**.

We are a group of neighbors who have met and had many discussions in these three weeks since the first meeting. We represent our "Block Club" –households with frontage on the one way stretch of St Albans (both sides) as well as on the "shared alley" block bounded by Grotto-St Albans-Summit-Grand. It's a "one and a half block" sized block club. Our block club has had input from homeowner, renter, multi-generational, and co-housing households. Our block club includes varied household types: traditional 2-story and 3-story multifamily flats, a modern 4-unit multifamily with an elevator, converted mansion multifamily, townhouse, carriage house (with windows right on the alley), single family, duplex. The dominant form is multifamily. We have had three meetings: two outdoor socially distant meetings and a zoom meeting to increase our reach. We have had robust discussions on the sidewalk and in the alley, as well as on the computer via shared online tools and polls.

We can't in this letter fully summarize all the issues expressed. But we can convey the dominant themes.

The biggest concern and criticism of this proposed design center on four areas: building bulk and form, negative impacts on the neighborhood, lack of compliance with existing zoning rules and regulations, and market concerns.

Among those, the underlying, most repeated concern is the building size and form. And, it bears emphasizing that **the too-large scale** (extra tall height combined with near complete lot coverage) **creates or contributes to all the other problems**.

If there can be one overarching recommendation it is this: **the project should be scaled to match the neighborhood**, within the zoning requirements including the East Grand Avenue Overlay district requirements.

Thank you for time and consideration

**SAGGS Block Club**

Sent from my Verizon, Samsung Galaxy smartphone

**From:** [Susan Schloff](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Grand Ave, Dixie  
**Date:** Wednesday, June 30, 2021 9:03:06 AM

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To whom it may concern,

My name is Susan Schloff and I am a longtime resident of Summit Hill and frequent user of Grand Ave, having moved back to the Twin Cities in 1997 when my professional training was complete. I am writing to you to express concern for the zoning application for 695 Grand Ave. I oppose this for a number of reasons.

First, please know that I am a huge supporter of mixed use development. I love this neighborhood, initially as a renter in 1997, then a condo owner in 2000 and finally a home owner in 2006. I envision a future where I sell my home to another family and move to a condo or apartment that supports senior living.

However, I also believe that the reason Grand Avenue and the surrounding neighborhood is so charming is the character of the buildings, the restaurants and retail shops. The project, as proposed, is simply too big. The physical presence alone is an issue, but so is the impact it will have on traffic, parking, pricing, and neighborhood charm.

I realize this project has taken a great deal of time and thought on all sides. I believe that existing zoning rules can and should be followed to allow for consistent development in our neighborhood and ask that we do not make an 'exception' for one project.

Thank you for your consideration

Susan Schloff  
848 Fairmount Ave

**From:** [Judy Miller](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Dixies on Grand  
**Date:** Wednesday, June 30, 2021 9:43:25 AM

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I am very much opposed to the zoning application requested by Dixies on Grand Ave. The attraction to Grand Ave. has always been the small neighborhood feeling with nice shops and restaurants even though at times parking is a huge problem for visitors and homeowners/renters in the area. I moved 4 blocks from Lincoln and Victoria where Grand Avenue parking spilled over to Lincoln Avenue and beyond. The parking permits did not help. The structure proposed does not comply with the current zoning laws which have kept Grand Avenue a quaint part of St. Paul. The project is too big and I feel zoning exceptions should not be made.

I oppose the zoning application for 695 Grand Avenue

Judy Miller  
651 235 8391  
854 Linwood (formerly for 51 years a resident of 828 Lincoln)

**From:** [John Norton](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Cc:** [#CI-StPaul\\_Ward2](#)  
**Subject:** 695 Grand Ave Project  
**Date:** Wednesday, June 30, 2021 10:09:07 AM

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Saint Paul City Planning Commission and Zoning Committee,

We are writing to ask you to deny the rezoning request for 695 Grand Avenue from B2 to T3 for the reasons outlined below.

Thank you for your consideration.

John and Ann Norton  
12 Crocus Hill, St Paul, MN 55102

**Summary:** The proposed development at 695 Grand Avenue should be required to comply with existing zoning. The requested re-zoning and variances should not be granted for the following reasons:

--[if !supportLists]-->• <!--[endif]-->Non-Conformance with City of St Paul 2040  
Comprehensive Plan

<!--[if !supportLists]-->○ <!--[endif]-->The proposal violates the Core Values of the  
Comprehensive Plan.

<!--[if !supportLists]-->○ <!--[endif]-->The proposal violates multiple Goals and  
Policies of the Comprehensive Plan.

--[if !supportLists]-->• <!--[endif]-->Precedent for future development

<!--[if !supportLists]-->○ <!--[endif]-->The proposal would effectively re-zone the  
entire east end of Grand Avenue, not just this property.

--[if !supportLists]-->• <!--[endif]-->Impact on Historic Districts

<!--[if !supportLists]-->○ <!--[endif]-->The proposal would negatively impact the  
Saint Paul Historic Hill District, the State of Minnesota Historic Hill District, and  
the National Register of Historic Places Historic Hill District.

## Non-Conformance with 2040 Comprehensive Plan

### --[if !supportLists]-->• <!--[endif]-->Core Values

<!--[if !supportLists]-->◦ <!--[endif]-->“**Building on our assets.** We are a city that recognizes and builds on the unique human, physical and cultural assets of our diverse residents and neighborhoods.”

<!--[if !supportLists]-->▪ <!--[endif]-->The proposed development would detract from the cultural assets of the neighborhood by dominating and, literally overshadowing, properties within three historic districts.

<!--[if !supportLists]-->◦ <!--[endif]-->“**Growth and prosperity through density.** We are a city that supports well-designed development that responds to its neighborhood context, fosters diversity and prosperity, and brings economic opportunity to all residents.”

<!--[if !supportLists]-->▪ <!--[endif]-->The proposed development is not a “well-designed development that responds to its neighborhood context.”

<!--[if !supportLists]-->▪ <!--[endif]-->The proposed development is excessively large, out of context, and would overwhelm the surrounding neighborhood.

### --[if !supportLists]-->• <!--[endif]-->Focus: Economic Development

<!--[if !supportLists]-->◦ <!--[endif]-->“Integrating St Paul’s historic resources into neighborhood-based economic development strategies.”

<!--[if !supportLists]-->▪ <!--[endif]-->The proposed development does not integrate with St Paul’s historic resources. It would, instead, degrade them.

### --[if !supportLists]-->• <!--[endif]-->Focus: Urban Design

<!--[if !supportLists]-->◦ <!--[endif]-->Encourage high-quality urban design for residential development that is compatible with the pattern and scale of the neighborhood, but allow for innovation and consideration of market needs.

<!--[if !supportLists]-->▪ <!--[endif]-->The proposed development is not compatible with the pattern and scale of the neighborhood.

### --[if !supportLists]-->• <!--[endif]-->Land Use

<!--[if !supportLists]-->◦ <!--[endif]-->The proposed development is in an area designated for Mixed Use. It borders across the alley to the north with an area designated as an Urban Neighborhood.

<!--[if !supportLists]-->◦ <!--[endif]-->Policy LU-6. Foster equitable and sustainable economic growth by integrating Saint Paul’s historic resources into neighborhood-based economic development strategies.

<!--[if !supportLists]-->▪ <!--[endif]-->The proposed development does not integrate with St Paul’s historic resources. It would, instead, degrade them.

<!--[if !supportLists]-->◦ <!--[endif]-->Policy LU-17. Promote access to sunlight for solar energy systems while accounting for the development rights of adjacent properties (Map LU-6).

<!--[if !supportLists]-->▪ <!--[endif]-->The proposed development would significantly impair access to sunlight for solar energy systems for neighboring properties.

<!--[if !supportLists]-->◦ <!--[endif]-->Mixed Use

<!--[if !supportLists]-->▪ <!--[endif]-->Policy LU-29. Ensure that building massing, height, scale and design transition to those permitted in adjoining districts.

<!--[if !supportLists]-->• <!--[endif]-->The design of the proposed development does not transition to those permitted in the adjoining Urban Neighborhood to the north, and instead would stand in stark contrast with them.

<!--[if !supportLists]-->◦ <!--[endif]-->Neighborhood Nodes

<!--[if !supportLists]-->▪ <!--[endif]-->A neighborhood node has been designated at the corner of Grand Avenue and Victoria Street, three blocks to the west of the proposed development.

<!--[if !supportLists]-->▪ <!--[endif]-->Policy LU-30. Focus growth at Neighborhood Nodes using the following principles: 1. Increase density toward the center of the node and transition in scale to surrounding land uses.

<!--[if !supportLists]-->• <!--[endif]-->The proposed development is not toward the center of the node, and does not transition in scale to surrounding land uses.

<!--[if !supportLists]-->◦ <!--[endif]-->Housing

<!--[if !supportLists]-->▪ <!--[endif]-->Goal 6: Improved access to affordable housing.

<!--[if !supportLists]-->• <!--[endif]-->The development proposal does not disclose proposed rental rates, however, it does say they will be “market rate”.

However, similar units in the Oxbo Apartments development on West 7<sup>th</sup> Street rent starts at \$1155/month for a studio apartment and \$2245/month for a 2 bedroom. Similar units in the Harper Apartments development at the corner of Snelling and Selby Avenues rent for \$1260/month for a studio apartment and \$2275/month for a 2 bedroom. It seems highly unlikely the units in the proposed development will improve the affordability of housing in Saint Paul.

<!--[if !supportLists]-->▪ <!--[endif]-->Benefits of Missing Middle Housing

<!--[if !supportLists]-->• <!--[endif]-->The “missing middle” is a segment of the housing market that contains small-scale multifamily or clustered housing types compatible in scale with single-family neighborhoods. It is a land use, economic development and urban design strategy that allows cities to support walkable, transit-supportive neighborhoods without significantly increasing densities in predominantly single-family neighborhoods. Missing Middle housing provides more housing choice and therefore allows the city to better adapt to housing trends and market cycles. It is more sensitive to neighborhood context, allowing for gradual transition from Urban Neighborhoods to Mixed-Use areas and/ or Neighborhood Nodes. Missing Middle housing types include accessory dwelling units, duplexes, triplexes, fourplexes, courtyard apartments, bungalow courts, mansion-style multi-family and multiplexes. Excellent examples of these housing types can be found throughout Saint Paul.

<!--[if !supportLists]-->• <!--[endif]-->The proposed development does not follow and is incompatible with these recommendations. To the extent that the proposed development occupies a site that could otherwise be used for Missing Middle housing, it would work in opposition to this goal.

## Zoning Issues

--[if !supportLists]-->• <!--[endif]-->Rezoning

<!--[if !supportLists]-->◦ <!--[endif]-->According to Saint Paul’s website, some of the issues that are evaluated by the city with respect to rezoning proposals include:

<!--[if !supportLists]-->▪ <!--[endif]-->Compatibility with land use and zoning of property within the general area.

<!--[if !supportLists]-->▪ <!--[endif]-->Suitability of the property for the uses permitted under the existing zoning classification.

<!--[if !supportLists]-->▪ <!--[endif]-->The trend of development in the area of the property in question.

<!--[if !supportLists]-->▪ <!--[endif]-->Consistency with the Comprehensive Plan and the plans for the area that have been adopted by the City Council.

<!--[if !supportLists]-->◦ <!--[endif]-->Comments:

<!--[if !supportLists]-->▪ <!--[endif]-->The proposed development is not compatible with the surrounding land use and zoning.

<!--[if !supportLists]-->▪ <!--[endif]-->The property is suitable for the uses permitted under the existing zoning classification. No change is needed for it to be used.

<!--[if !supportLists]-->▪ <!--[endif]-->A new restaurant has been constructed and opened across the street from the proposed project, complying with the existing zoning.

<!--[if !supportLists]-->▪ <!--[endif]-->The proposed changes are not consistent with the Comprehensive Plan and the plans for the area that have been adopted by the City Council.

--[if !supportLists]-->• <!--[endif]-->Variances

<!--[if !supportLists]-->◦ <!--[endif]-->According to Sec. 61.601 of the Saint Paul Zoning Code, the Board of Zoning Appeals must make the following six findings before they can grant a variance:

<!--[if !supportLists]-->1. <!--[endif]-->The variance is in harmony with the general purposes and intent of the zoning code.

<!--[if !supportLists]-->2. <!--[endif]-->The variance is consistent with the comprehensive plan.

<!--[if !supportLists]-->3. <!--[endif]-->The applicant has established that there are practical difficulties in complying with the provision, that the property owner proposes to use the property in a reasonable manner not permitted by the provision. Economic considerations alone do not constitute practical difficulties.

<!--[if !supportLists]-->4. <!--[endif]-->The plight of the landowner is due to circumstances unique to the property not created by the landowner.

<!--[if !supportLists]-->5. <!--[endif]-->The variance will not permit any use that is not allowed in the zoning district where the affected land is located.

<!--[if !supportLists]-->6. <!--[endif]-->The variance will not alter the essential character of the surrounding area.

<!--[if !supportLists]-->○ <!--[endif]-->Comments: Four of the six findings do not apply to the proposed project: (2), (3), (4), and (6). As such, the requested variances must be denied. To grant them would violate the Saint Paul city code.

--[if !supportLists]-->• <!--[endif]-->Precedent for Future Development

<!--[if !supportLists]-->○ <!--[endif]-->This project is not the only one of its type to be proposed for the east end of Grand Avenue. Lunds/Byerlys has proposed a similar project at 791 Grand Avenue. That project would require similar zoning changes and variances. If the requested changes are granted for this project, even though it does not meet the requirements for the rezoning or variances, it will be impossible to legally deny similar changes for the Lunds/Byerlys project, or any similar project that might be proposed in the future. In effect, by granting the requested changes when the requirements are not met, the City of Saint Paul will be changing the zoning for the entire east end of Grand Avenue to that requested for this project.

#### Impact on Historic Districts

--[if !supportLists]-->• <!--[endif]-->Adjacent City of Saint Paul, Historic Hill District

--[if !supportLists]-->• <!--[endif]-->Within State of Minnesota, Historic Hill District

--[if !supportLists]-->• <!--[endif]-->Adjacent National Register of Historic Places, Historic Hill District

<!--[if !supportLists]-->○ <!--[endif]-->“Area 7: Grand Avenue; a one-block commercial/apartment area on Grand Avenue between St. Albans and Dale Streets.” “This area comprises the remainder of the turn of the century commercial/services strip which served the Summit-Crocus-Grand Hill area. This area formerly extended several blocks to the west, however, the segment of Grand Avenue between Dale and Saint Albans Streets is the only portion to retain a significant degree of its pre-World War I integrity. In addition to several brick-

faced one and two storey commercial structures, there are eleven four and five storey apartment structures within this one-block area. Only one of the structures (commercial) intrudes upon the overall architectural integrity; it now functions as a multi-functional auto-repair and shops building. To the east, Grand Avenue slopes to its intersection with Grand Hill and Oakland Avenue; to the north and south are found pre-dominantly single-family and duplex-type buildings; to the west the historic character deteriorates abruptly into a strip of autosales lots and fast-food establishments.” – Historic Hill District, National Register of Historic Places Inventory -- Nomination Form, August 13, 1976.

--[if !supportLists]-->• <!--[endif]-->Comment: To date, there has been no discussion regarding the potential impacts on these three historic districts. The potential impacts could include physical damage from construction equipment or vibrations, and visual damage to the resource due to the type of new construction. At a minimum, an Environmental Assessment needs to be performed to identify the potential impacts.

**From:** [Moe Kharrazi](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Vote NO on the 695 Grand Proposal  
**Date:** Wednesday, June 30, 2021 10:09:48 AM  
**Attachments:** [Response to the Staff Report \(1\).pdf](#)

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Hello-

I'm a long time resident of this community. I initially came here as a renter roughly 10 years ago, and have now owned three different condos/homes in the area. This proposed project is unacceptable and is not compatible with what drew me to the Summit Hill neighborhood.

The future of our neighborhood depends on your vote to DENY the application to rezone. Please see attached document for more detailed objections, and make it a part of the public record.

THANK YOU-

Moe Kharrazi  
380 Ramsey St, St Paul, MN 55102

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If I sit silently, I have sinned.  
Dr. Mossadegh

Application 21-271-810 695 Grand Rezoning

1. The Metro Transit website for [Route 63](#) shows at the bottom of the schedule the approximate frequency of this route. The frequency is 20 minutes or more 77% of the time. The only time it is shorter is during rush hours where the frequency is between 10 and 20 minutes. Route 63 has a below-average utilization in a bus system that saw a 4.5% reduction in ridership and 1.4% reduction in total transit usage in 2018. In addition, multiple bus stops have been eliminated on Grand Avenue, including the one on the SE corner of St. Albans and Grand across the street from this proposed development. It requires transfers to other lines in order to connect with our highest capacity light rail system. This does not constitute an example of a high frequency, high-capacity transit corridor. Metro Transit has 14 designated “High Frequency” routes with no more than 15 minutes between trips. Route 63 is not one of them and does not meet the required transit standards for a project of this density so this application should be denied.
2. The height limit design standards for both the existing T2 and the requested T3 zoning for rear property lines that abut residential zoned districts RL – RT2, which is the case here and as the staff letter indicates, is 25 feet plus step-backs equal to the additional height (see [66.331](#) – Footnote e). This design does not follow these design guidelines and thus forcing their request for a CUP to exempt them from this design standard. Economic consideration is the only driver for this request, which does not constitute a practical difficult required for granting this CUP. The response to the failure to incorporate this design standard should be to deny this application.
3. The comparison to the design standards for RM2 residential districts is incomplete. The height limit design standards for the RM2 residential zoned districts to the west and across the street, which is the case here is 50 feet, as the staff letter indicates. Yet, the required setbacks for an RM2 district for new structures are 25 feet in the front and on the side Footnote (k) “For portions of a building over fifty (50) feet in height, the minimum side and rear yard setbacks shall be twenty-five (25) feet or nine (9) feet plus one-half the building height over fifty (50) feet, whichever is less. (see [66.320](#)). This design does not follow these design guidelines and thus again force the requests for a CUP and/or a variance to exempt them from this design standard. There are not any T3 zoned areas on Grand Avenue and the proposal also exceeds the standards established by the East Grand Avenue Overlay District (“EG”), which is the current applicable zoning. Again, economic considerations are the only driver for this demand, which does not constitute a practical difficult required for granting this submission. The response to the failure to incorporate this design standard should be to deny this application.
4. The staff letter implies that Grand Avenue qualifies as a “major transit street” and states that rezoning to T3 is intended to provide for a “mix of housing styles, types and sizes to accommodate households of varying sizes, ages and incomes”. The comments in #1 above dispel the idea that Grand Avenue with one bus that most periods runs 3 times an hour or less is not a major transit street. Additionally, this proposal is for 80 market rate apartments running from \$1,400 to over \$2,600 a month rent (which far exceeds the average Summit Hill rent of \$920/month) plus \$175 a month per parking slot is only aimed at higher income level tenants and does nothing to promote a diverse mix of tenants. Also, using Grand Place (the 6-story building referenced) as a comparable property is invalid. Yes, Grand Place is the tallest building

on Grand Avenue. It is setback 30 feet from Grand, 26 feet from the alley and 12 feet from properties on each side. The shadow cast by this building falls on a surface parking lot. Hardly an equitable comparison. Based on this, the rezoning to T3 for this proposal is inappropriate and should be denied.

5. The benefits, pointed to from the 2040 Comprehensive Plan (LU-27, LU-14, LU-6), claimed in this section could all equally be provided by a smaller structure that properly transitioned to the adjacent residential zones with much less negative impact on the neighborhood. LU-1 instructs that the majority of the growth should be directed to areas with the “highest existing or planned transit capacity.” Again, comments above in #1 dispel the idea that Grand Avenue has a high existing level of transit and there has been no indications of any plans to upgrade the capacity. As such, this proposal should be denied.
6. This finding again tries to equate “highest existing or planned transit capacity” with transit accessibility. There is a bus but, as it has been shown above, it does not meet Metro Transit’s standards qualify as “High Frequency”. As such, this application should be denied.
7. A smaller structure, with more appropriate transitions to the lower density adjacent zoning districts, would equally comply with the 2006 Summit Hill/District 16 Neighborhood Plan. Refer to the comments in #2 and #3 above as to how this proposal violates the design standards called for by EG. As such, this application should be denied.
8. Future plans to review the EG – East Grand Avenue Overlay District should not influence whether to exempt this proposal from following the current zoning standards. Rezoning requests, as part of a more comprehensive review of area zoning, would make sense. This is a request to spot zone out of EG for a property strictly for the benefit of the developer and investors. As such, this application should be denied. Further, this will result in similar results up and down the Avenue, changing the culture and creating adverse effects for the residents, businesses and employees because of the density.
9. There is nothing that precludes the developers from using this property for a building that conforms to the existing zoning code. Economic considerations are the only drivers for rezoning to enable taller structures with greater financial returns. As such, this application should be denied.
10. Since this request has now been revised to retain the current EG zoning regulations, the proposed zoning to T3 would be inconsistent with the surrounding uses (as noted above). It would not be done as part of a comprehensive zoning effort. It would establish a use classification inconsistent with the surrounding areas and create an island of non-conforming use. The application should be denied.

submitted by Moe Kharrazi

**From:** [Elaine Dunbar](#)  
**To:** [Butler, Sonja \(CI-StPaul\)](#); [\\*CI-StPaul PED-ZoningCommitteeSecretary](#)  
**Subject:** Concerns regarding zoning application for 695 Grand--reject current plan  
**Date:** Wednesday, June 30, 2021 10:19:56 AM

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Hi,

I support a mixed-use development at 695 Grand in compliance with current zoning rules.

Having been a Summit Hill Association Board Member when one of the early neighborhood plans was developed--the first to include the perspective of those who rent--I urge you to insist that the new use for the property conforms to the established plan.

Furthermore, I have read that there is a petition with over 2,000 signatures of folks expressing reservation about the current plan. I believe more weight should be given to the opinions of these citizens.

Thank you,

Elaine Dunbar

**From:** [Brenda Besser](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Oppose 695 Grand Proposed Project, submit for public comment  
**Date:** Wednesday, June 30, 2021 10:44:25 AM

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Planning Committee Members:

I oppose the 695 Grand Avenue project and its application to move to T3 zoning. Along with the massive size overwhelming the character of its immediate neighbors, this proposed building is too big for the limitations of the roads that will serve it.

T3 is dependent on a strong, high-frequency transit infrastructure, which Grand Avenue will never be able to provide at the level of comparable T3 zones in St. Paul. The 63 bus is sufficient for local stops along Grand, but the capacity of Grand as a transit thoroughfare is and always will be limited due to it being a two-lane street that also serves cars, bikes, and pedestrians.

The focus for high density housing, per the 2040 Plan, is near high frequency transit routes. Ridership statistics reported by the Metropolitan Council support this, pre-Covid ridership on all local routes decreased over several years while routes offering express service, such as the light rail and A-Line, saw increases in use. A building the size of the 695 project is appropriate for existing T3 locations, not the proposed location.

Thank you,

Brenda Besser  
24 St. Albans St. S. #2  
St. Paul, MN 55105

**From:** [June Ofstedal](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Oppose 695 Grand Avenue Proposal, please submit to public comment  
**Date:** Wednesday, June 30, 2021 11:41:52 AM

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Dear St Paul City Planning Commission,

I'm writing to express some of my many concerns regarding the proposed 695 Grand Ave development. I've lived on St Albans between Summit and Grand for the past decade, and while I was initially happy to hear of a new multifamily residence in the Dixies lot, I have many reservations with this plan.

First, I fear that the scale of the project, and the number of units and new residents, is too large given the current parking and public transit infrastructure of the area. Through junior high and high school, and during my breaks from college, I relied on the 63 bus on Grand and the 65 bus up Dale to get home from school after club meetings, to visit friends, and to go to work. As much as I appreciate these busses, they run far too infrequently, and are far too prone to delays, to be considered reliable and attractive transportation options for residents of the new building. Using either of these lines to connect me to the Green Line to a job I had in downtown Minneapolis took between 45 minutes and an hour one way, while the drive was 15-20 minutes.

I realize that most residents and visitors of the proposed development would commute by car - a quick drive down St Albans between Summit and Grand shows that street parking is already usually full, and with street parking on both sides of St Albans, it can be difficult to even get down the street in the winter. Turning left onto Grand, or even going straight, can require several minutes' wait during rush hour.

I truly believe in the importance of multifamily/higher density residences, but I feel like the proposed development is motivated by profit, not by a genuine care for the neighborhood or for potential new residents. As a recent college graduate living at home for the time being, I am thrilled by the idea of more affordable housing in St Paul, and I would certainly welcome more young people, and people of more diverse socio-economic backgrounds, to the neighborhood. However, I've seen the proposed prices of these units, and of the underground parking spaces, and they're so high as to be prohibitive to many. I'm tired of hearing developers evoke the ideal of more walkable, accessible, diverse neighborhoods to justify projects motivated simply by profit.

Thank you for taking the time to read this, and I hope you will take my concerns into consideration.

June Ofstedal  
24 Saint Albans St S  
Saint Paul MN 55105

**From:** [Denise Aldrich](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary; ZLU@SummitHillAssociation.org](#)  
**Subject:** comments on proposed 695 Grand Ave Dev't  
**Date:** Wednesday, June 30, 2021 11:48:32 AM

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To whom it may concern:

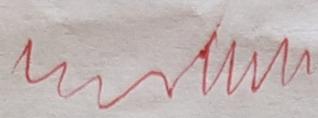
I am writing to express my opinions on the proposed development at 695 Grand Ave.

For the record, I am a member of the Summit Hill Association Board of Directors, but the comments contained herein are my own personal comments and do not reflect the views of the Board.

1. **I am strongly opposed to allowing the property to zone out of the E Grand Avenue Overlay District (EGAOD).** It sets a bad precedent to allow individual property owners to decide to opt-out.
2. **I am opposed to rezoning the property to T3.** The standing Neighborhood Plan specifically states that the area should NOT rezone to B3/T3.
3. **I support the application for the height and set-back variances.** Despite the above, I support this project as currently designed. (I believe the developer could have gotten to the same results asking for variances from the EGAOD.)
  - a. **The requested height is not completely out of character with the neighborhood.** Since this project began, I have done a lot of driving around the neighborhood. There are several historic buildings that are 3, 3.5, and 4 stories. There are some that are 3.5 that are set up on an 8-ft hill. The effect of a 3.5-storey building on a 8-ft hill is the same height as a 4.5-storey building.
  - b. **The U-Shape of the proposed building echoes historical buildings in the neighborhood.** Just northeast of 695 Grand Ave is a 3- or 4-story U-shaped residential building. And my favorite example is the Commodore, which measures in at 7 stories. The U-shape, with the outdoor dining space and terrace for residents, is an appropriate and welcome addition to Grand Ave.
4. **Opposition to this project seems to be concentrated among those who live closest to it.** I plotted an approximate map of all the listed address of public comments that were received at SHA by June 18. Those who support the project are indicated by a green dot; those opposed have a red dot. Close to the project, almost all of the dots are red. Once you look at residents who live 2 or more blocks away from the project, the dots shift to a majority of green/support.

What comes up in conversations over and over again, is that everyone who lives in this neighborhood does so because of the proximity to Grand Ave with its shops and restaurants. Grand Ave. is an essential part of this neighborhood and the proposed new development—retaining excellent restaurants and a local owner—will be a welcome update.

Regards,  
Denise Aldrich  
1053 Linwood Ave  
St Paul MN 55105



**INGA**  
**LENTZ** 692 Summit  
**LUNNING** 634 Summit  
**RAWAY** 1039 Grand  
**PHILLIPS** 785 Goodrich  
**MCGRATH**  
**TURNER** Grand / Avon  
**PETERS** (Fairmount)  
**FROELICH**  
**LITCHY** 24 Grotto  
 893 Goodrich  
**SPENCE**  
**MAKINEN**  
**RUBIN**  
**FITZGERALD**  
**ADELSHEIM** 818 Grand  
**MCKEEN**  
**OLESON** 42 Albans  
**MASON** St Albans  
**PARSONS** St Albans  
**HALLAND** 720 Summit  
**BURNS** 610 Summit  
**THOMPSON** Osceola



<b>FERREIRA</b>	876 Osceola <b>CLANTON</b>	682 Summit <b>TODD</b>	147 Grand <b>MELSON</b>	764 Lincoln <b>MAGEE</b>
<b>GROSS</b>	<b>BENOLKEN</b>	Grand Ave <b>THRON</b>		<b>STEVENS</b>
<b>TYNDAL</b>	1137 Lincoln <b>WENGER</b>	977 Goodrich <b>STERNITZKA</b>		9 St Albans <b>BACH</b>
681 Lincoln <b>DRAKE</b>	<b>BHARGAVA</b>	<b>BLOCK CLUB</b>	22 Grotto <b>LANGFORD</b>	790 Summit <b>RUHLAND</b>
30 Albans <b>BRENNAN</b>	30 St Albans <b>USTALD</b>	12 Crocus Hill <b>NORTON</b>	20 Grotto <b>LAND</b>	617 Goodrich <b>REICHERT</b>
<b>WILLMAN</b>	672 Summit <b>SKRELLA</b>	785 Goodrich <b>MERWIN</b>	751 Goodrich <b>CURRIE</b>	769 Lincoln <b>PESEK</b>
692 Summit <b>LENTZ</b>	<b>RUPENTHAL</b>	<b>LINDGREN</b>	<b>BENSEN</b>	<b>DHRN</b>
<b>PAINTER/SOMERMAYER</b>	<b>JOHNSON</b>	<b>HIGHLAND</b> 28 Albans	<b>JONES/Employee</b>	<b>MOLSTEAD</b>
821 Summit <b>KUSTRITZ</b>	<b>HIGHLAND</b> 28 Albans	721 Summit <b>CLYDSDALE</b>	<b>CLYDSDALE</b>	<b>WENGER Brian</b>
722 Summit <b>KRUCHANKA</b>	1067 Linwood <b>EICHTEN</b>	874 Fairmount <b>BROWN</b>	30 St Albans <b>KUCERA</b>	859 Osceola <b>ANDERSON</b>
<b>DANIELSON</b>			<b>WENGER Kate</b>	703 Linwood <b>PATTERSON</b>

773 Goodrich Avenue  
St. Paul, MN 55105  
June 30, 2021

Planning Commission  
Department of Planning & Economic Development  
Zoning Section  
1400 City Hall Annex  
25 W 4<sup>th</sup> St.  
Saint Paul, MN 55102-1634

Dear Members of the Planning Commission:

## I OPPOSE THE GRANTING OF A CONDITIONAL USE PERMIT FOR 695 GRAND AVENUE

I oppose the conditional use permit until a comprehensive and independent traffic study is conducted for the project.

I have lived at 773 Goodrich Avenue for 30 years. I am a past president of the Summit Hill Association and of the Ramsey Hill Association. I am a past chair of the city's Heritage Preservation Commission. I have always thought of the HPC as a sister commission to the planning commission. Like the planning commission the HPC is charged with applying explicit, written criteria. We on the HPC learned through hard experience that it was dangerous to substitute personal opinion for those criteria. We did not want to damage our credibility with either the public or the city council. Nor suffer defeat in litigation.

I sometimes wonder if the developer -- and certainly its traffic consultant -- has spent much time on Grand Avenue. If they had, they, like Summit Hill residents and business people, would have seen:

- Pedestrians skittishly crossing from one side of Grand to the other;
- Spontaneous memorials to pedestrians who did not make it;
- Semi-trucks illegally using the turning lane as a parking lane;
- Delivery vans, like Amazon, double parking -- "just for a minute" -- and backing up traffic for a block.
- St. Alban's becoming an icy path barely a car-width wide (I run St. Alban's several times a week, summer *and* winter.)

Rather than continuing I am including three photographs. They are worth several thousand additional words.

On the other hand the developers' familiarity with traffic problems on Grand and St. Alban's may explain why they hired a traffic consultant who opined, in effect, "Hey, no problem."

I am not a traffic engineer. Yet I have had only to look online to familiarize myself with the content of comprehensive traffic studies. I've read studies from Saratoga Springs in New York state to Sammamish in the state of Washington. Their thoroughness raises serious questions about the adequacy of the 695 report. A few examples:

- The developers' consultant applied an industry formula, and did his math, but why did he use the land use code for "mid-rise residential" when he could have used the code for "mid-rise residential with first floor commercial?"
- The report assumes two restaurants. There are in fact four proposed businesses. Each will equate success with higher traffic: more cars equals more dollars.
- The report nowhere takes into account the width and use of existing streets. St. Alban's is 34' wide; Snelling is 100' wide with multiple lanes. From the report alone you wouldn't know where you were.
- Unlike other traffic studies the report does not take pedestrians into account. The developers predict that 80 new households – on foot – will revitalize Grand Avenue. But for how long will traffic halt for them? How often? Other studies estimate crossing times and even indicate ameliorating crosswalks.
- Unlike other studies, the report does not examine the effect of increased traffic on nearby businesses that currently rely on convenient access – those in-and-out businesses like Penzey's, George's, Tom the Tailor, Perrier liquor, Fattalone's.
- The report does not address the city's parking studies, created over decades, that prove the significant shortfall in existing parking and the harmful effects of cars circling in search of parking.
- The report does not address the increase in traffic from service vehicles like garbage trucks.
- Nor does the report address the transformational change created by online ordering. 80 new households – the equivalent of 7 or 8 Summit Hill blocks – will order everything from an Amazon vacuum cleaner to a Domino's pizza. Every one of those deliveries will be made using St. Alban's – summer *and* winter. Consider how aggressive delivery drivers have become. Imagine the backups that will fill St. Alban's. Imagine residents and delivery vehicles idling on Summit waiting to make the turn onto St. Alban's.

Time constraints on testimony prevent me from continuing. Perhaps it is enough to say that the consultant's report is a generic study, a generic study for a generic development.

Surely we can do better.

I ask you to lay this matter over until critical traffic issues are identified, evaluated, discussed, and resolved.

Sincerely,

Charles Skrief  
773 Goodrich Avenue  
[cskrief@mac.com](mailto:cskrief@mac.com)



Note the illegal use of the turn lane as a parking lane.



Note the double-parked vehicle and the illegally parked semi, which requires the passenger cars to navigate around them.



Another example of delivery vehicles clogging streets designed for a horse and carriage.

**From:** [Shannon O'Toole](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary; Butler, Sonja \(CI-StPaul\)](#)  
**Subject:** Public Comment 695 Grand/Dixie's  
**Date:** Wednesday, June 30, 2021 11:53:31 AM  
**Attachments:** [1993 Parking Survey re St. Albans and Grand.pdf](#)  
[Summit Hill Parking Count - 5 12 - 5 17, 2020 8pm .pptx](#)  
[Summit Hill Parking Count May 2020.png](#)

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**I oppose rezoning to accommodate this project.** I join in the comments already submitted by Lori Brostom, Brian Wenger, and Sonja Mason who have eloquently stated the legal, zoning, and design reasons this project should not go forward in its present form. I have been a resident of Summit Hill for 61 years, and I have served on the Summit Hill Association ("SHA") twice, including as president when it created, with considerable professional planning assistance, the current Neighborhood Comprehensive Plan. I have seen many proposals, but none so patently and purposefully dismissive of the neighborhood and neighbors closest to it as this 695 Grand project.

**I strongly support the East Grand Avenue Overlay in its present configuration with all limitations,** as does my neighborhood as demonstrated by the results of the survey taken by the Summit Hill Association in connection with its efforts to update the Neighborhood Comprehensive Plan. Furthermore, at a recent Summit Hill Association meeting to discuss that survey data, support for the East Grand Avenue Overlay Plan in its present form was virtually unanimous among the citizens who attended that meeting.

**I am particularly concerned about the exacerbation of parking issues due to the 695 Grand project.** Summit Hill is one of the densest areas in the city, and much of the density is concentrated on Grand Avenue with its many old apartments and condominiums, few of which have sufficient off street parking for residents. Extracts from parking surveys from 1993 and 2020 (in the height of COVID with NO commercial traffic or parking, see attached) show that parking availability at Grand and St. Albans is a particular problem, yet this developer seeks to provide not even one parking space per apartment unit and reportedly plans to require any residents desiring parking to pay \$175 per space. The 31 spaces planned for the retail establishments, particularly if two or more restaurants, is woefully low and is all that is provided for staff as well as patrons. The paucity of parking will push both residential and business parking to Summit and Lincoln and streets further north and south - streets already suffering actual parking shortfalls. The conclusory Trip Generation Study commissioned by the developer reflects an absence of any knowledge of or concern about the area around St. Albans and Grand.

In closing, while this project may be a boon for the developers, it will be terrible for Grand Avenue. People from other areas of the Twin Cities say they avoid shopping on Grand Avenue because of perceived parking problems. News of an 80 unit apartment building with grossly insufficient parking will only worsen this perception and hurt business on the avenue, both chain and independent.

**I urge you to reject the rezoning request for the 695 Grand project.** Thank you.

--

Shannon O'Toole  
223 Avon Street South  
Saint Paul, MN 55105-3319

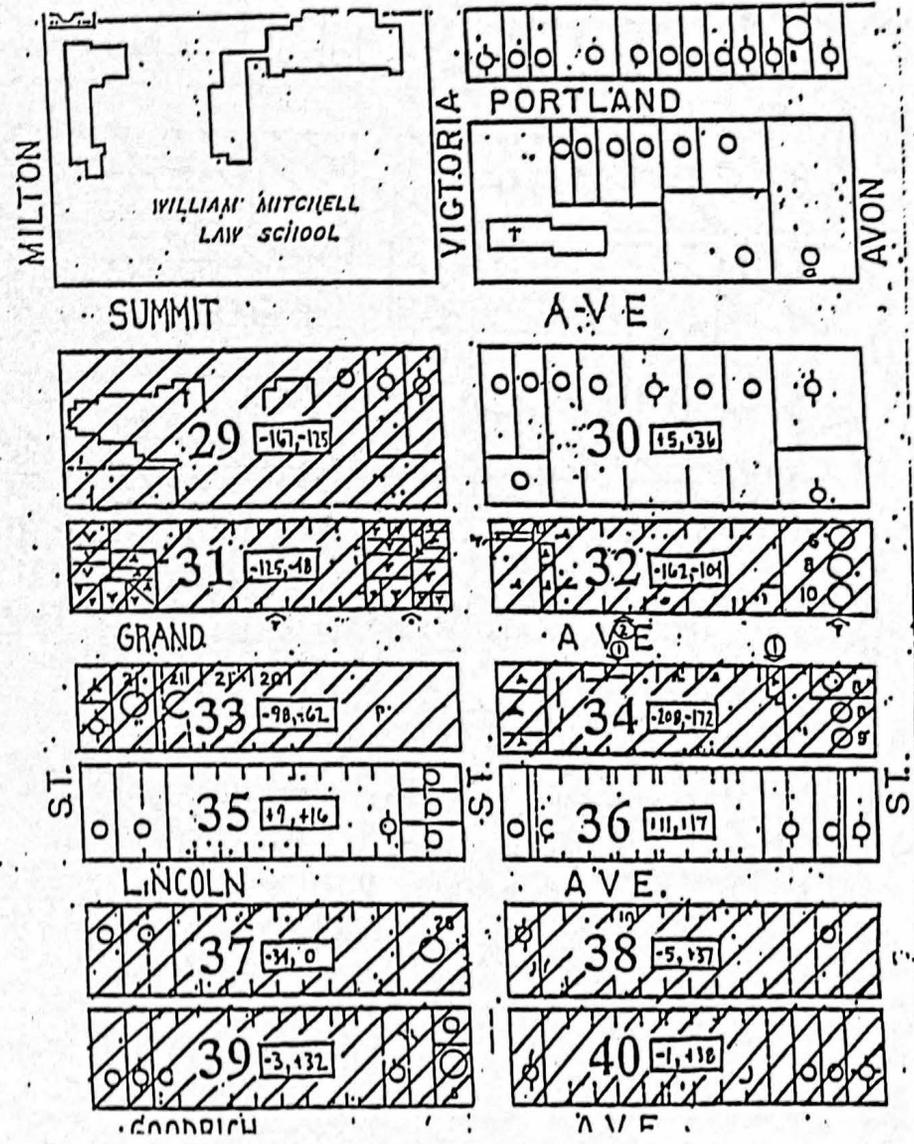
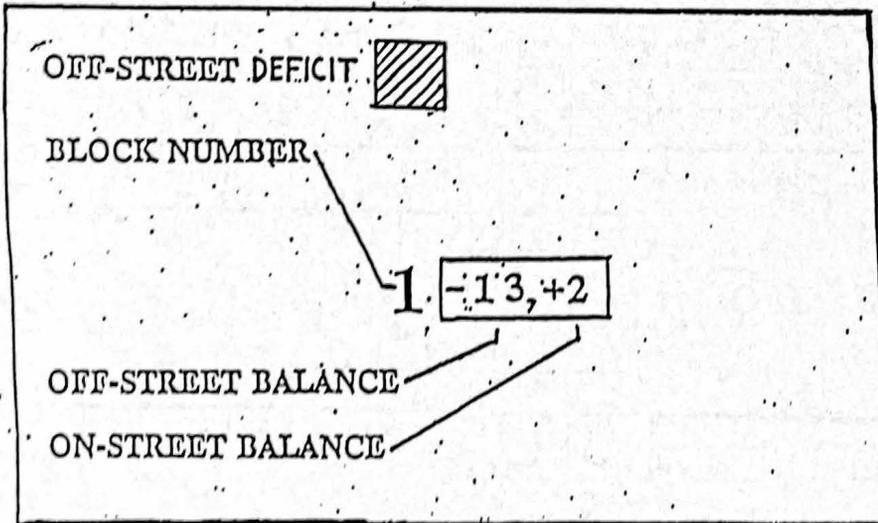
612-750-3393

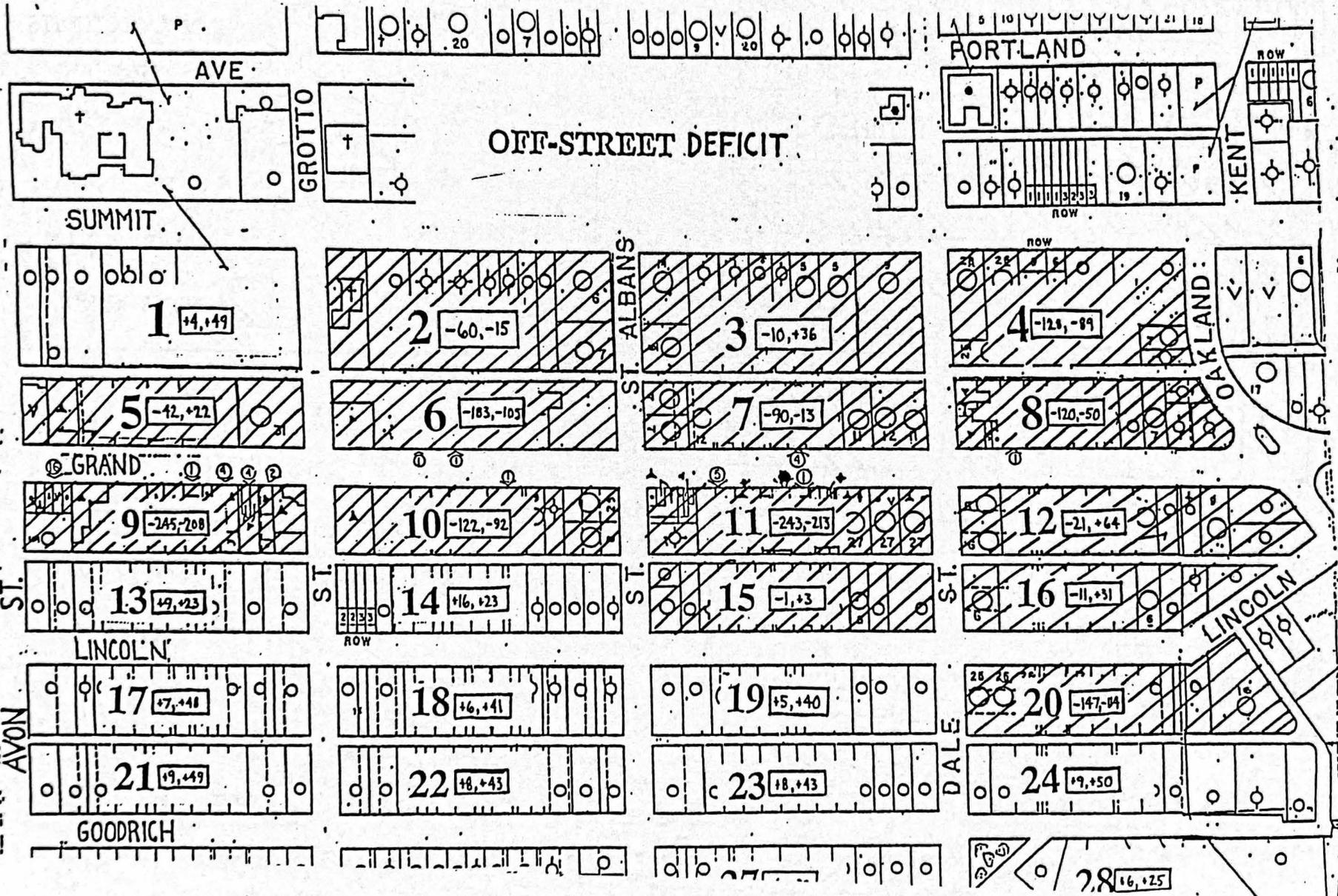
[sotoole.esq@gmail.com](mailto:sotoole.esq@gmail.com)

# PARKING SUMMARY

OFF-STREET DEFICIT BLOCKS

MAP 4





OFF-STREET DEFICIT

SUMMIT

AVE

PORTLAND

KENT

ST ALBANS

OAKLAND

GRAND

ST

ST

ST

ST

LINCOLN

AVON

DALE

LINCOLN

GOODRICH

1 +4, +49

2 -60, -15

3 -10, +36

4 -128, -89

5 -42, +22

6 -183, -103

7 -90, -13

8 -120, -50

9 -245, -208

10 -122, -92

11 -243, -213

12 -21, +64

13 +9, +23

14 +16, +23

15 -1, +3

16 -11, +31

17 +7, +41

18 +6, +41

19 +5, +40

20 -147, -14

21 +9, +49

22 +8, +43

23 +8, +43

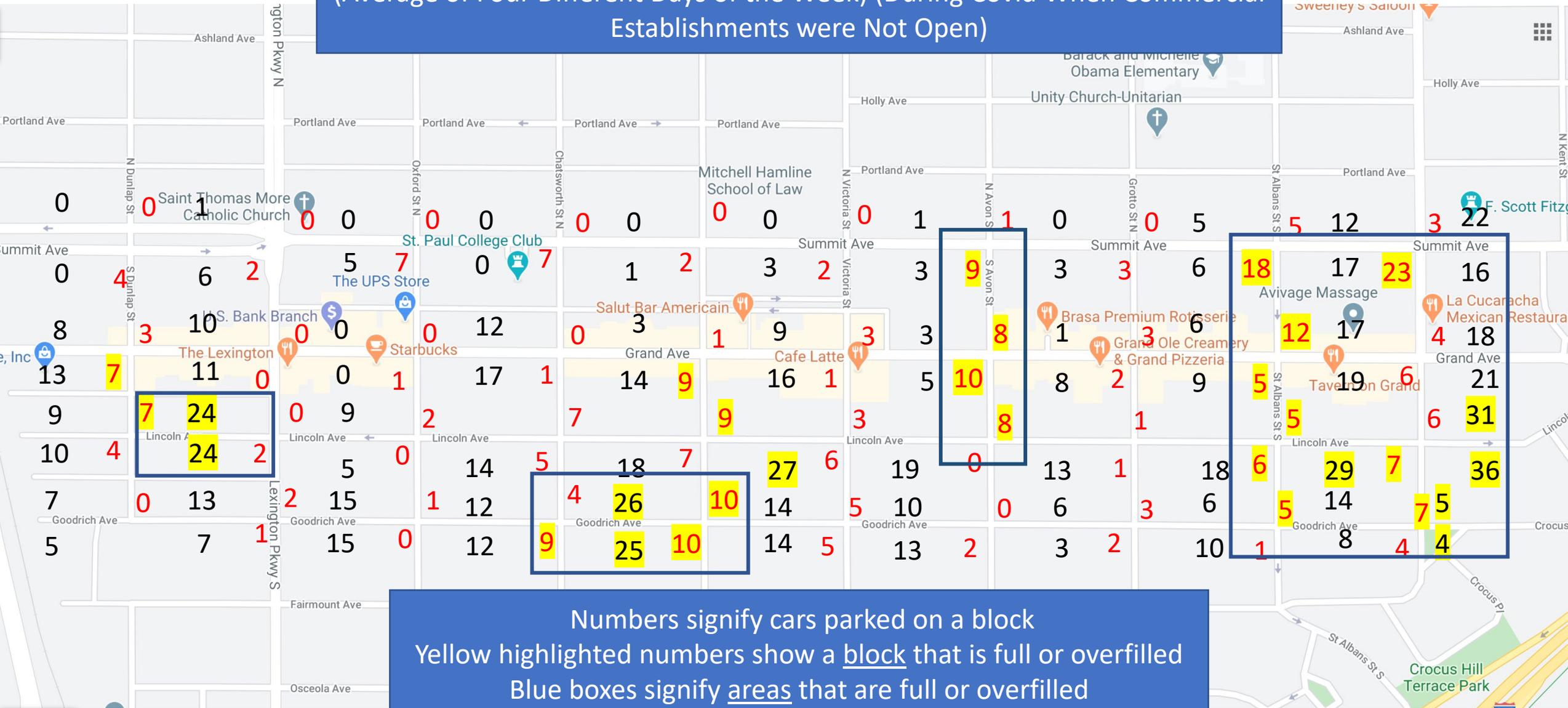
24 +9, +50

28 +6, +25

# PARKING SUMMARY GRAND AVENUE STUDY TABLE 1

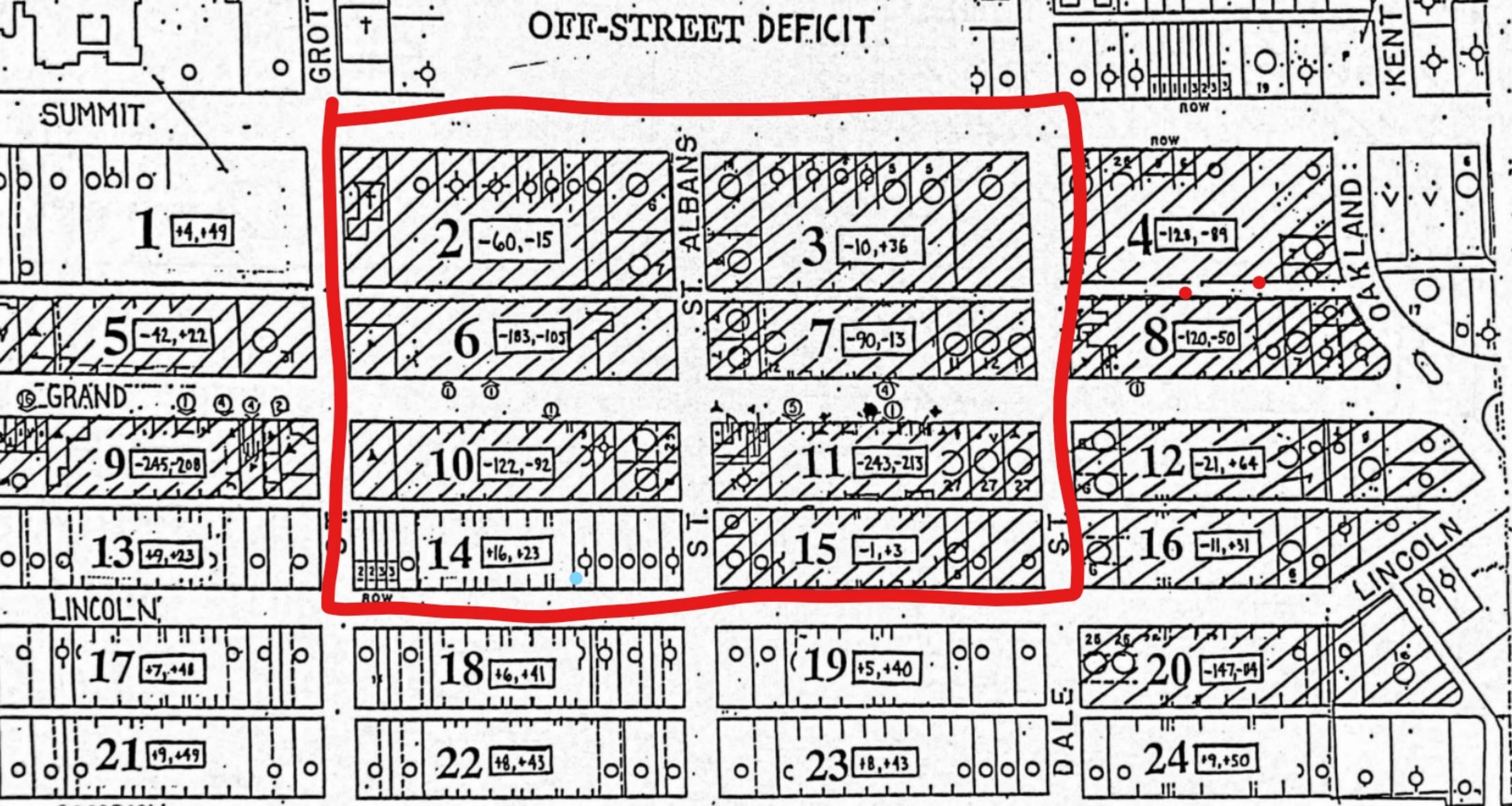
BLOCK	OFF STREET			ON STREET	
	REQUIRED	PROVIDED	BALANCE	PARKING	BALANCE
1	9	13	+4	45	+49
2	109	49	-60	45	-15
3	67	57	-10	46	+36
4	164	36	-128	39	-89
5	169	127	-42	64	+22
6	288	105	-183	78	-105
7	144	54	-90	77	-13
8	151	31	-120	70	-50
9	333	88	-245	37	-208
10	198	76	-122	30	-92
11	315	72	-243	30	-213
12	70	49	-21	85	+64
13	10	19	+9	14	+23
14	19	35	+16	7	+23
15	41	40	-1	4	+3
16	49	38	-11	42	+31
17	14	21	+7	41	+48

Summit Hill RESIDENTIAL ONLY Parking Counts in May, 2020 at 8 pm  
 (Average of Four Different Days of the Week) (During Covid When Commercial Establishments were Not Open)



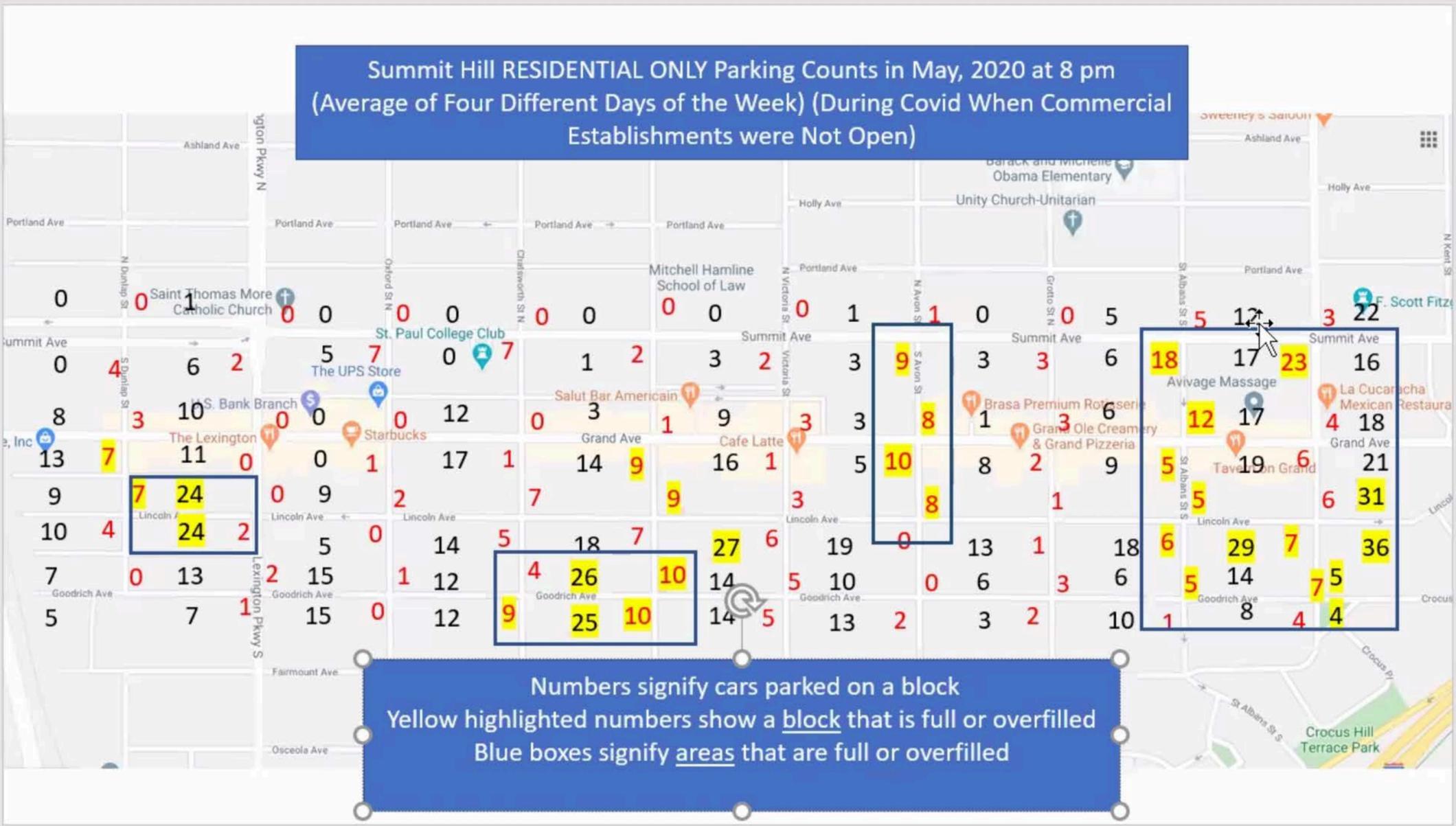
Numbers signify cars parked on a block  
 Yellow highlighted numbers show a block that is full or overfilled  
 Blue boxes signify areas that are full or overfilled

# OFF-STREET DEFICIT



File Home Insert Draw Design Transitions Animations Slide Show Review View Help Shape Format Share Comments

Clipboard Slides Font Paragraph Drawing Editing Voice Designer



**From:** [Kathleen G Wenger](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Grand Does Not and Will Not Have Transit to Support T3 Zoning.  
**Date:** Wednesday, June 30, 2021 11:55:04 AM  
**Attachments:** [East Grand Avenue Transit Ridership 2013 to 2019.pdf](#)  
[Rt 63 Ridership vs Local Major Transit Nodes 2019.pdf](#)  
[Cars In St. Paul By Income Levels.pdf](#)

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## Introduction:

T3 zoning is predicated on strong transit infrastructure. This is not the case on Grand and has never been. Therefore, a development with T3 zoning is not appropriate for Grand Ave. This is different than, for example, on University or Snelling.

## Details:

East Grand Avenue Transit Ridership 2013 to 2019 shows the 9 stops between Dale and Lexington for Route 63 along Grand. Metro Transit collects this data for the last 3-4 months of each year (which is good--it encompasses September, which is likely a high-traffic time, with later months where the weather might impact ridership negatively). It shows average on-boarding and off-boarding per day, per stop. It's further broken down by weekday, Saturday and Sunday. Some observations:

- Weekdays are clearly busier than weekends--and that's true of every stop. That's true even if accounting for the 6 more buses/day during the week; the ons/offers per trip are still somewhat higher. That indicates that the buses are used more for commuting than by visitors to Grand. Since visitors are clearly not using the bus to come to Grand, this speaks strongly to the need for plentiful parking.
- Given the low usage of the St. Albans stop, it is clear that Dixie's/Emmetts/Saji-ya customers are clearly not taking the bus. Furthermore, and because of the low usage, that St. Alban's stop has now been dropped by the MTC.
- Most importantly, overall transit usage has gone down over the 7 years of data in this data set:
  - Note that more trips/buses were added between 2013 and 2017: going from 2196 to 2718, respectively, for a 23.8% increase in trips/day. However, there was not a commensurate increase in ridership--the on and off rates in both directions increased, but at a much lower rate. There is some variability and anomalies on the individual stop and day of the week level, which is odd, but the on/offers per stop are so small that it wouldn't take much to show a big percentage swing.
  - Added is a "per trip per stop" line to try and get a benchmark that would work across all the metrics and even out the stop-specific swings. Again, there is a decline between 2013 and 2017 on that level, as well, and it's in double digits.
  - Going to the 7-year change data, the decline is even more pronounced. While the ons and offs are up slightly at 2.4% and 5.1%, respectively, they are still far below the 23.8% increase in trips over that time period, which means that on a per trip per stop basis, the number is even lower than it was in 2017. Also realize what that number means: a person gets on or off the bus less than 1/3 of the time there is a bus stopping among those 9 stops on this stretch of East

Grand.

- The actual number of ons and offs declined across these stops between 2017 and 2019.
- Because they increased the number of trips, the argument that there aren't enough buses is not supported by the data. If the demand had actually been there, the ridership would have increased at least commensurately with the greater capacity. It not only didn't, per the point above, they declined.

Moving to the Rt. 63 vs. local major transit node table. Think of it in this way: There is significantly less ridership across the 18 (east and west) total stops on the Rt. 63 section of Grand Ave.--on a per trip per stop basis--than there is on one stop/direction on any of these major nodes. These would be the nodes that are/should be targets for T3 zoning, and for the most part they are--because they can support the much higher demand/usage. As observed:

- The Rt. 84 local stops of Snelling and Grand and Snelling and University have the lowest numbers--they compete with the much more intensively used A line which makes the same stops. Factor in the light rail line at Snelling and University and there's even more competition on those two stops. Even with that, the 2 Snelling and Grand stops have a per trip per stop on/off average of .50--which is 56% higher compared with the .32 average for the 18 Grand Avenue stops. This is the same with the 2 Dale and University local stops with a per trip per stop on/off average of 1.97--more than 6 times the level of usage, meaning that 2 people get on or off the bus across the .32 rate for the 18 East Grand Avenue stops.
- As to the Snelling and University A Line usage, the per trips per stop at 4.7 across the two stops is almost 15 times higher than East Grand Avenue across 18 stops.
  - Even factoring in some usage for Allianz stadium in 2019 (it opened in April 2019) there were only 3 events in September and beyond that would have occurred during the ridership count period that year.
- Even in the highly unlikely event that someone from every unit in the proposed development as proposed took the bus--on and off--each day, ridership on Rt. 63 wouldn't even come close to even the Snelling or Dale local stops.

### **Summary:**

In summary, the data and discussion below evidence the following. Grand has not been, is not, and will not be, a major transit corridor. Bus ridership is down. People living, visiting and working in this area are simply not avid bus/transit users, even before the pandemic. Finally, because of the high rents in the proposed project, the City's own data shows that these renters, with the income necessary to pay those rents ((\$1400 - \$2700) per month, plus parking) will all have cars (98%). Please see attached chart from the City. Thus, the inadequate parking and intense use of the streets now for parking make the project not feasible for the proposed site. This does not mean that a more intense use than the current three restaurants is not possible and appropriate

Please let me know if you have questions.

Kate Gregor Wenger

818 Goodrich

## Summit Hill Bus Ridership Statistics and Trends: 5 and 7 Year, Dale to Lexington (Route 63)

Source: Metropolitan Council, average daily boardings and alightings from early September to December

Stop Name	Fall 2013				Fall 2017				% change 5 years			Fall 2019				% change 7 years		
	Trips/Day	Schedule	Ons	Offs	Trips/Day	Schedule	Ons	Offs	Trips/Day	Ons	Offs	Trips/Day	Schedule	Ons	Offs	Trips/Day	Ons	Offs
	Grand Ave & Lexington Pkwy	37	Saturday	19	13	49	Saturday	19	17	32.4%	2.8%	32.0%	49	Saturday	16	20	32.4%	-15.1%
Grand Ave & Lexington Pkwy	34	Sunday	12	7	48	Sunday	9	10	41.2%	-27.7%	51.3%	48	Sunday	10	12	41.2%	-20.3%	73.5%
Grand Ave & Lexington Pkwy	50	Weekday	32	18	55	Weekday	26	31	10.0%	-20.2%	72.4%	55	Weekday	27	25	10.0%	-15.7%	39.9%
Grand Ave & Oxford St	37	Saturday	16	13	49	Saturday	15	11	32.4%	-7.9%	-15.2%	49	Saturday	15	13	32.4%	-7.2%	-1.9%
Grand Ave & Oxford St	34	Sunday	12	8	48	Sunday	10	9	41.2%	-14.2%	5.2%	48	Sunday	10	11	41.2%	-14.1%	33.9%
Grand Ave & Oxford St	50	Weekday	30	19	55	Weekday	25	16	10.0%	-16.8%	-14.9%	55	Weekday	25	25	10.0%	-19.3%	28.5%
Grand Ave & Chatsworth St	37	Saturday	5	5	49	Saturday	6	9	32.4%	27.7%	80.2%	49	Saturday	7	10	32.4%	37.2%	100.1%
Grand Ave & Chatsworth St	34	Sunday	3	3	48	Sunday	4	6	41.2%	41.4%	80.1%	48	Sunday	4	7	41.2%	48.7%	137.4%
Grand Ave & Chatsworth St	50	Weekday	13	8	55	Weekday	11	11	10.0%	-12.3%	25.7%	55	Weekday	12	13	10.0%	-5.5%	51.0%
Grand Ave & Milton St	37	Saturday	12	11	49	Saturday	14	16	32.4%	19.9%	50.1%	49	Saturday	11	18	32.4%	-7.9%	61.9%
Grand Ave & Milton St	34	Sunday	8	6	48	Sunday	11	13	41.2%	34.9%	113.1%	48	Sunday	7	11	41.2%	-14.7%	78.8%
Grand Ave & Milton St	50	Weekday	20	18	55	Weekday	24	21	10.0%	20.6%	16.0%	55	Weekday	18	22	10.0%	-9.7%	20.4%
Grand Ave & Victoria St	37	Saturday	15	26	49	Saturday	17	24	32.4%	13.8%	-9.3%	49	Saturday	14	23	32.4%	-5.6%	-12.3%
Grand Ave & Victoria St	34	Sunday	11	15	48	Sunday	18	18	41.2%	55.9%	19.0%	48	Sunday	12	15	41.2%	11.3%	-4.1%
Grand Ave & Victoria St	50	Weekday	35	35	55	Weekday	26	27	10.0%	-25.4%	-21.2%	55	Weekday	26	27	10.0%	-26.4%	-23.6%
Grand Ave & Avon St	37	Saturday	8	11	49	Saturday	12	14	32.4%	50.2%	28.7%	49	Saturday	5	14	32.4%	-34.4%	35.9%
Grand Ave & Avon St	34	Sunday	4	7	48	Sunday	7	8	41.2%	67.9%	18.8%	48	Sunday	6	10	41.2%	40.8%	53.1%
Grand Ave & Avon St	50	Weekday	15	14	55	Weekday	15	12	10.0%	1.0%	-11.2%	55	Weekday	9	16	10.0%	-40.0%	12.3%
Grand Ave & Grotto St	37	Saturday	20	22	49	Saturday	15	21	32.4%	-24.5%	-3.0%	49	Saturday	16	19	32.4%	-22.3%	-14.2%
Grand Ave & Grotto St	34	Sunday	19	18	48	Sunday	18	19	41.2%	-5.5%	2.8%	48	Sunday	14	17	41.2%	-25.9%	-7.0%
Grand Ave & Grotto St	50	Weekday	25	27	55	Weekday	18	28	10.0%	-28.5%	7.1%	55	Weekday	22	29	10.0%	-14.6%	7.7%
Grand Ave & St Albans St	37	Saturday	7	10	49	Saturday	8	7	32.4%	18.2%	-24.5%	49	Saturday	8	12	32.4%	8.7%	21.3%
Grand Ave & St Albans St	34	Sunday	4	4	48	Sunday	7	6	41.2%	79.4%	75.4%	48	Sunday	7	6	41.2%	73.6%	77.3%
Grand Ave & St Albans St	50	Weekday	13	15	55	Weekday	11	14	10.0%	-15.0%	-8.4%	55	Weekday	15	19	10.0%	17.9%	22.7%
Grand Ave & Dale St	37	Saturday	34	16	49	Saturday	36	27	32.4%	5.6%	68.5%	49	Saturday	31	20	32.4%	-9.3%	29.7%
Grand Ave & Dale St	34	Sunday	28	9	48	Sunday	26	17	41.2%	-8.3%	85.2%	48	Sunday	19	14	41.2%	-34.2%	57.9%
Grand Ave & Dale St	50	Weekday	69	26	55	Weekday	54	37	10.0%	-21.9%	45.1%	55	Weekday	61	33	10.0%	-12.4%	30.7%
<b>Subtotal, Eastbound Saturday</b>	<b>333</b>		<b>135</b>	<b>127</b>	<b>441</b>		<b>142</b>	<b>147</b>	<b>32.4%</b>	<b>5.3%</b>	<b>15.8%</b>	<b>441</b>		<b>122</b>	<b>150</b>	<b>32.4%</b>	<b>-10.0%</b>	<b>18.3%</b>
<b>Subtotal, Eastbound Sunday</b>	<b>306</b>		<b>102</b>	<b>78</b>	<b>432</b>		<b>110</b>	<b>106</b>	<b>41.2%</b>	<b>7.8%</b>	<b>36.9%</b>	<b>432</b>		<b>90</b>	<b>104</b>	<b>41.2%</b>	<b>-12.3%</b>	<b>34.4%</b>
<b>Subtotal, Eastbound Weekday</b>	<b>450</b>		<b>253</b>	<b>180</b>	<b>495</b>		<b>211</b>	<b>198</b>	<b>10.0%</b>	<b>-16.6%</b>	<b>10.2%</b>	<b>495</b>		<b>215</b>	<b>207</b>	<b>10.0%</b>	<b>-15.3%</b>	<b>15.3%</b>
<b>Total, Eastbound Rt. 63 (9 Stops)</b>	<b>1089</b>		<b>491</b>	<b>384</b>	<b>1368</b>		<b>464</b>	<b>451</b>	<b>25.6%</b>	<b>-5.5%</b>	<b>17.5%</b>	<b>1368</b>		<b>426</b>	<b>461</b>	<b>25.6%</b>	<b>-13.2%</b>	<b>20.2%</b>
<b>Per Trip Per Stop Ons and Offs</b>			<b>0.45</b>	<b>0.35</b>			<b>0.34</b>	<b>0.33</b>						<b>0.31</b>	<b>0.34</b>			

Trips: Number of scheduled trips. Note: all had adequate APC (automatic passenger counter) data observed

Ons: Average daily boardings

Offs: Average daily alightings

Stop Name	Fall 2013				Fall 2017				% change 5 years			Fall 2019				% change 7 years		
	Trips/Day	Schedule	Ons	Offs	Trips/Day	Schedule	Ons	Offs	Trips/Day	Ons	Offs	Trips/Day	Schedule	Ons	Offs	Trips/Day	Ons	Offs
Grand Ave & Dale St	37	Saturday	16	25	48	Saturday	21	28	29.7%	30.5%	11.0%	48	Saturday	22	27	29.7%	30.9%	4.5%
Grand Ave & Dale St	34	Sunday	12	19	48	Sunday	16	25	41.2%	29.9%	28.0%	48	Sunday	16	18	41.2%	31.6%	-8.3%
Grand Ave & Dale St	52	Weekday	28	48	54	Weekday	37	50	3.8%	32.9%	3.2%	54	Weekday	33	51	3.8%	19.6%	6.0%
Grand Ave & St Albans St	37	Saturday	7	6	48	Saturday	9	7	29.7%	37.3%	1.7%	48	Saturday	8	7	29.7%	16.1%	5.1%
Grand Ave & St Albans St	34	Sunday	4	4	48	Sunday	6	7	41.2%	50.9%	91.1%	48	Sunday	8	5	41.2%	82.7%	38.0%
Grand Ave & St Albans St	52	Weekday	12	11	54	Weekday	11	9	3.8%	-15.5%	-24.2%	54	Weekday	14	12	3.8%	14.5%	8.1%
Grand Ave & Grotto St	37	Saturday	15	19	48	Saturday	22	14	29.7%	44.1%	-27.3%	48	Saturday	21	19	29.7%	34.2%	-2.5%
Grand Ave & Grotto St	34	Sunday	12	18	48	Sunday	20	17	41.2%	58.7%	-5.7%	48	Sunday	15	14	41.2%	19.2%	-23.5%
Grand Ave & Grotto St	52	Weekday	21	28	54	Weekday	27	21	3.8%	30.2%	-26.4%	54	Weekday	23	26	3.8%	11.3%	-8.4%
Grand Ave & Avon St	37	Saturday	7	5	48	Saturday	10	8	29.7%	34.1%	50.7%	48	Saturday	12	6	29.7%	65.1%	19.1%
Grand Ave & Avon St	34	Sunday	5	3	48	Sunday	9	8	41.2%	76.8%	146.9%	48	Sunday	11	5	41.2%	102.7%	67.1%
Grand Ave & Avon St	52	Weekday	10	13	54	Weekday	11	13	3.8%	10.5%	-6.2%	54	Weekday	16	9	3.8%	66.1%	-29.9%
Grand Ave & Victoria St	37	Saturday	26	18	48	Saturday	20	22	29.7%	-20.7%	22.6%	48	Saturday	19	15	29.7%	-25.0%	-19.3%
Grand Ave & Victoria St	34	Sunday	14	17	48	Sunday	17	17	41.2%	18.0%	0.5%	48	Sunday	16	12	41.2%	10.2%	-27.9%
Grand Ave & Victoria St	52	Weekday	28	44	54	Weekday	22	37	3.8%	-19.3%	-16.6%	54	Weekday	23	30	3.8%	-18.1%	-31.4%
Grand Ave & Milton St	37	Saturday	10	11	48	Saturday	19	15	29.7%	87.2%	37.9%	48	Saturday	16	12	29.7%	54.0%	6.7%
Grand Ave & Milton St	34	Sunday	6	9	48	Sunday	15	12	41.2%	126.5%	23.6%	48	Sunday	10	8	41.2%	61.3%	-19.6%
Grand Ave & Milton St	52	Weekday	13	20	54	Weekday	23	23	3.8%	75.0%	13.7%	54	Weekday	21	20	3.8%	61.3%	1.2%
Grand Ave & Chatsworth St	37	Saturday	5	5	48	Saturday	7	5	29.7%	44.2%	-2.6%	48	Saturday	8	7	29.7%	81.8%	55.6%
Grand Ave & Chatsworth St	34	Sunday	3	4	48	Sunday	7	2	41.2%	125.8%	-44.9%	48	Sunday	7	4	41.2%	116.4%	-3.0%
Grand Ave & Chatsworth St	52	Weekday	10	15	54	Weekday	9	11	3.8%	-6.5%	-25.8%	54	Weekday	12	12	3.8%	28.7%	-18.2%
Grand Ave & Oxford St	37	Saturday	9	15	48	Saturday	12	18	29.7%	30.8%	21.7%	48	Saturday	11	13	29.7%	24.4%	-11.1%
Grand Ave & Oxford St	34	Sunday	7	10	48	Sunday	7	9	41.2%	4.5%	-1.6%	48	Sunday	11	9	41.2%	59.6%	-9.5%
Grand Ave & Oxford St	52	Weekday	16	32	54	Weekday	15	26	3.8%	-6.1%	-17.2%	54	Weekday	18	25	3.8%	18.9%	-20.9%
Grand Ave & Lexington Pkwy	37	Saturday	17	15	48	Saturday	23	17	29.7%	30.4%	19.0%	48	Saturday	20	14	29.7%	12.8%	-0.7%
Grand Ave & Lexington Pkwy	34	Sunday	11	10	48	Sunday	15	11	41.2%	37.5%	4.7%	48	Sunday	13	12	41.2%	22.8%	17.3%
Grand Ave & Lexington Pkwy	52	Weekday	26	27	54	Weekday	30	25	3.8%	15.2%	-4.7%	54	Weekday	33	25	3.8%	24.7%	-5.6%
<b>Subtotal, Westbound Saturday</b>	<b>333</b>		<b>112</b>	<b>120</b>	<b>432</b>		<b>143</b>	<b>134</b>	<b>29.7%</b>	<b>27.0%</b>	<b>11.9%</b>	<b>432</b>		<b>136</b>	<b>120</b>	<b>29.7%</b>	<b>20.8%</b>	<b>0.1%</b>
<b>Subtotal, Westbound Sunday</b>	<b>306</b>		<b>76</b>	<b>94</b>	<b>432</b>		<b>112</b>	<b>107</b>	<b>41.2%</b>	<b>48.1%</b>	<b>13.9%</b>	<b>432</b>		<b>107</b>	<b>86</b>	<b>41.2%</b>	<b>40.8%</b>	<b>-8.5%</b>
<b>Subtotal, Westbound Weekday</b>	<b>468</b>		<b>164</b>	<b>239</b>	<b>486</b>		<b>185</b>	<b>214</b>	<b>3.8%</b>	<b>13.2%</b>	<b>-10.3%</b>	<b>486</b>		<b>195</b>	<b>212</b>	<b>3.8%</b>	<b>19.2%</b>	<b>-11.3%</b>
<b>Total, Westbound Rt. 63 (9 Stops)</b>	<b>1107</b>		<b>352</b>	<b>453</b>	<b>1350</b>		<b>440</b>	<b>456</b>	<b>22.0%</b>	<b>25.1%</b>	<b>0.6%</b>	<b>1350</b>		<b>438</b>	<b>418</b>	<b>22.0%</b>	<b>24.3%</b>	<b>-7.7%</b>
<b>Per Trip Per Stop Ons and Offs</b>			<b>0.32</b>	<b>0.41</b>			<b>0.33</b>	<b>0.34</b>						<b>0.32</b>	<b>0.31</b>			
<b>TOTAL (18 Stops)</b>	<b>2196</b>		<b>843</b>	<b>837</b>	<b>2718</b>		<b>904</b>	<b>907</b>	<b>23.8%</b>	<b>7.3%</b>	<b>8.3%</b>	<b>2718</b>		<b>863</b>	<b>879</b>	<b>23.8%</b>	<b>2.4%</b>	<b>5.1%</b>
<b>Per Trip Per Stop Ons and Offs</b>			<b>0.38</b>	<b>0.38</b>			<b>0.33</b>	<b>0.33</b>		<b>-13.3%</b>	<b>-12.5%</b>			<b>0.32</b>	<b>0.32</b>		<b>-17.2%</b>	<b>-15.1%</b>
Trips: Number of scheduled trips. Note: all had adequate APC (automatic passenger counter) data observed																		
Ons: Average daily boardings																		
Offs: Average daily alightings																		

# Addendum: Residential Parking Requirements in St. Paul

## How much parking do we need?

Any discussion of new requirements should start with an analysis of current housing stock: what is built right now, which community needs are presently accommodated, and which are not.

This perspective is important because code changes do not happen in a vacuum. As the City's 2040 plan notes, St. Paul is not a blank slate. It is already a developed urban environment with **existing parking provision**. New density is likely to come primarily from **infill development** - a developer buying an existing lot and redeveloping it.

The basic question for us to answer, therefore, is *not* baseline residential parking need. It is how likely new infill development might affect **total** supply and demand for parking in the neighborhood - i.e. **new plus existing**.

## Limitations of Parking 'Shortfall' Analysis

When attempting to answer this question, just looking at **current shortfall** is of limited value on its own:

**Parking shortfall** describes only how many **off-street spaces** are required by code vs. how many are currently built:

- It says nothing about **total supply** of parking available in a neighborhood (including on-street, surface lots, ramps etc.)
- It also says nothing about **utilization**, i.e. whether there's an actual parking **shortage**. Note that utilization varies massively with use and time of day - a big church lot might be full on a Sunday morning and empty the rest of the week.

Even **current utilization** only reflects the neighborhood we have today:

- It reflects only the **current demographic mix**. If our neighborhood is currently made up mostly of affluent white families with 2 cars, they need more parking than a neighborhood of a different composition.
- It reflects only **current travel needs**. If the neighborhood were to become more walkable, transit were to improve, or remote work were to become more prevalent, some proportion of households might downgrade to a single car or give up their current single vehicle altogether. Equally, if more jobs move to the

suburbs and transit options remain the same, people will need more cars than they have now.

The above bullets capture two basic ideas: (1) We need to understand the current supply and demand in our neighborhood and the city more generally, and (2) we need to make a more subjective assessment of whether we're happy with the status quo.

## Parking Supply Under Current Code (New Construction)

The current zoning requirements mandate that every new residential unit built **must** be built with **one or more** parking spaces:

<i>Residential Uses</i>	
One- and two-family dwelling unit	1.5 spaces per unit
Multiple-family dwelling unit	1 space per 1—2 room unit, 1.5 spaces per 3—4 room unit, and 2 spaces per unit with 5 or more rooms.  For the purpose of this requirement: efficiency unit = 1 room, one bedroom unit = 2 rooms, two bedroom unit = 3 rooms, three bedroom unit = 4 rooms, four bedroom unit = 5 rooms, and so on. A den, library, or other extra room shall count as a room; kitchen, dining and sanitary facilities shall not

*Excerpt from table [63.207](#), Minimum Required Off-Street Parking By Use*

In virtually every case, this guarantees at least 1 space per unit, and often guarantees a **minimum of 1.5 spaces per unit**:

- A single family home must provide **at least one**<sup>1</sup> off-street space. New single family homes in St. Paul are in fact being built with **2 car detached garages**<sup>2</sup>. Building a 2 car detached garage costs at least \$35-\$40k per garage at current market prices.
- A duplex must provide a **minimum of 3** off-street spaces.

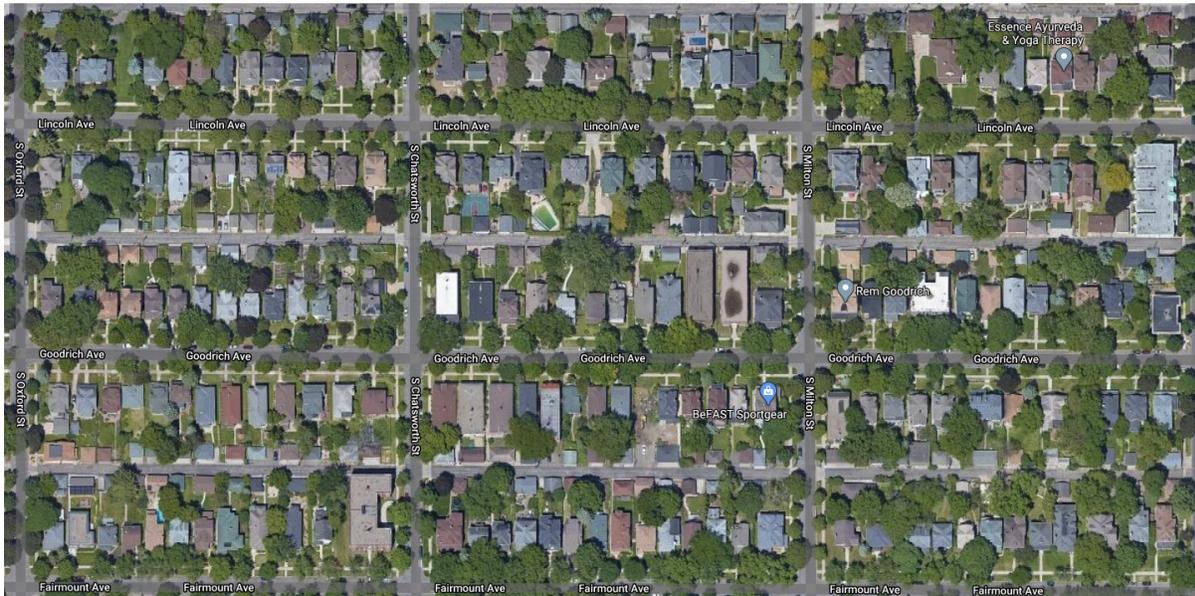
<sup>1</sup> The zoning code allows any partial spaces to be rounded down, up to and including .5 of a space.

<sup>2</sup> See e.g. [Zillow search of New Construction for sale in St. Paul](#) - every single new SFH is built with a garage, typically 2-3 car. New SF suburban developments follow the same typology e.g. [Robert Thomas Homes](#).

- In multi-family developments, between **1 and 2 spaces per unit** must be provided. Note that per code, 'rooms' ≠ 'bedrooms'. The assumption is that even a 500ft studio apartment must come with **at least one** off-street parking spot (likely 1 per adult), and every set of two 2-bedroom units must provide **at least 3** off-street spaces (even though the most likely total occupancy of those 2 units is 4 adults).

## Existing Single Family / Duplex Stock

Even though many of these were built before current zoning regulations came into force. Virtually every SFH or duplex in our neighborhood has been built with a **2 or 3 car garage** backed onto an alley:



Therefore, current **off-street parking** per side of a block is perhaps closer to **35 spaces** (assuming avg. 2.5 off street spaces per lot), considerably *above* the current code minimum (14).

The main exception to this is that some of the older multi-family buildings provide *less* parking than would be required today (as we discovered when we looked at the RM study). These developments bring down the block average accordingly.

## Factoring in on-street parking

The above figures (code and existing provision) account for off-street parking only. They **exclude a significant number of on-street spaces**:

- Per our RM analysis, it would be possible to accommodate an additional **2 vehicles in front** of each 40ft lot and **3 vehicles in front** of each 60ft lot, as well as an additional **8 vehicles** per ~160ft long side street.

- Assuming typical 14 SFH per side of a block in Summit Hill, current code would specify a *minimum* of 14 off-street spaces per side. When allowing for approximately 28 cars along the frontage (12x 40ft lots with 2 spaces each + 2x 60ft lots on the corners with 3 spaces each, minus the corners, per side for a total of 30), 8 down each of the two side streets for a total of 16, that's a total of **60 spaces for 14 households**. That's a **minimum per code of 4.29 parking spaces total per household**. You can double these numbers to get the block total i.e. 120 spaces for 28 households, still 4.29 per household.
- When we look at the actual built environment instead of minimums per code, the total parking spaces actually provided per side of a block of SFH in St. Paul today is more like **81 per 14 households i.e. 5.79 parking spots per household**.

Even if no off-street parking were provided, each side of a typical block can accommodate 44 vehicles for a typical total of **92 vehicles per block** solely via on-street parking. Off-street parking provision should therefore be construed *in addition to* this baseline provision. That is a major reason behind the recommendation in most parking studies to allow on-street parking to be counted towards minimum parking requirements.

## Summary Table

This table summarizes the above discussion, and shows the typical amount of parking currently provided on a typical block vs. minimum code requirements (brackets).

Type of block	On-street Spaces	Off-street (min)	Total spaces (min)	Total per household (min)
Single family	92	70 (28)	162 (120)	<b>5.79</b> (4.29)
Duplexes		98 (84)	190 (176)	<b>3.39</b> (3.14)

### Notes:

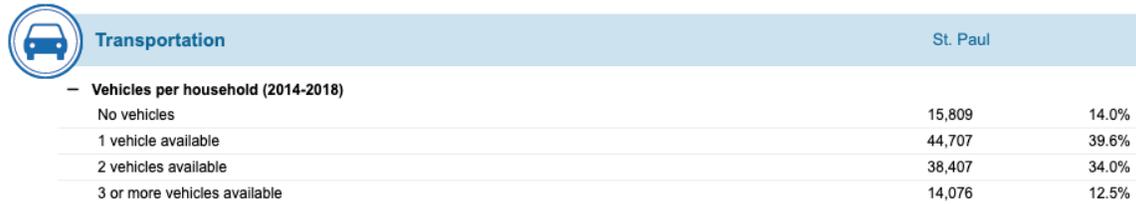
1. *The figures assume the entire block consists of properties of that type. In each case, I have assumed 28 lots per whole block, and either 28 or 46 total households.*
2. *The numbers represent actual built capacity, whereas those in brackets represent the minimum number of parking spaces required by code.*
3. *For SFH, my working assumption is that most properties have at least a 2 car garage and potentially a 3 car garage or an extra space alongside a 2-car, even though the code requirement is only 1 space. So I have used a value of 2.5 off-street spaces per SFH.*
4. *For duplexes, my working assumption is that some will provide a 3 car garage, others will provide a 2 car garage and 2 open spaces on the lot, or simply 4 open spaces along the back of the lot. I have therefore assumed a value of 3.5 off-street spaces per duplex.*
5. *[I have not attempted to estimate multi-family yet, though it would follow a similar pattern except for grandfathered buildings. If someone wants to take this on, go ahead!]*

# Assessing Residential Parking Demand

## Vehicle Ownership

In the City of St. Paul, approximately **14.8%** of households do not own a vehicle. This is significantly above the national average of 9.1%.<sup>3</sup> According to MN Compass (which puts the figure at a marginally lower 14%), this equates to **approximately 15,000 households** in St. Paul<sup>4</sup> which do not own a vehicle.

According to MN Compass, the breakdown is as follows:



Transportation		St. Paul	
— Vehicles per household (2014-2018)			
No vehicles		15,809	14.0%
1 vehicle available		44,707	39.6%
2 vehicles available		38,407	34.0%
3 or more vehicles available		14,076	12.5%

Screenshot from [MN Compass, St. Paul MN](#)

It's also worth noting that 39.6% of households own just one vehicle.

That number should be considered against typical code requirements of 1.5 or more parking spaces per household and typical garages providing at least 2 spaces, all before on-street parking is factored in.

Taking non-car and single-car households together, **fully 54.6% of households** in St. Paul have access to (and are paying for) off-street parking in excess of their current needs. When on-street parking is factored in, this number is likely significantly higher.

<sup>3</sup> Figures from the National Equity Atlas

[https://nationalequityatlas.org/indicators/Car\\_access/By\\_race~ethnicity:49791/United\\_States/St.\\_Paul\\_City,\\_MN/](https://nationalequityatlas.org/indicators/Car_access/By_race~ethnicity:49791/United_States/St._Paul_City,_MN/)

These figures are also corroborated by Governing.com based on the US Census Survey

<https://www.governing.com/gov-data/car-ownership-numbers-of-vehicles-by-city-map.html>

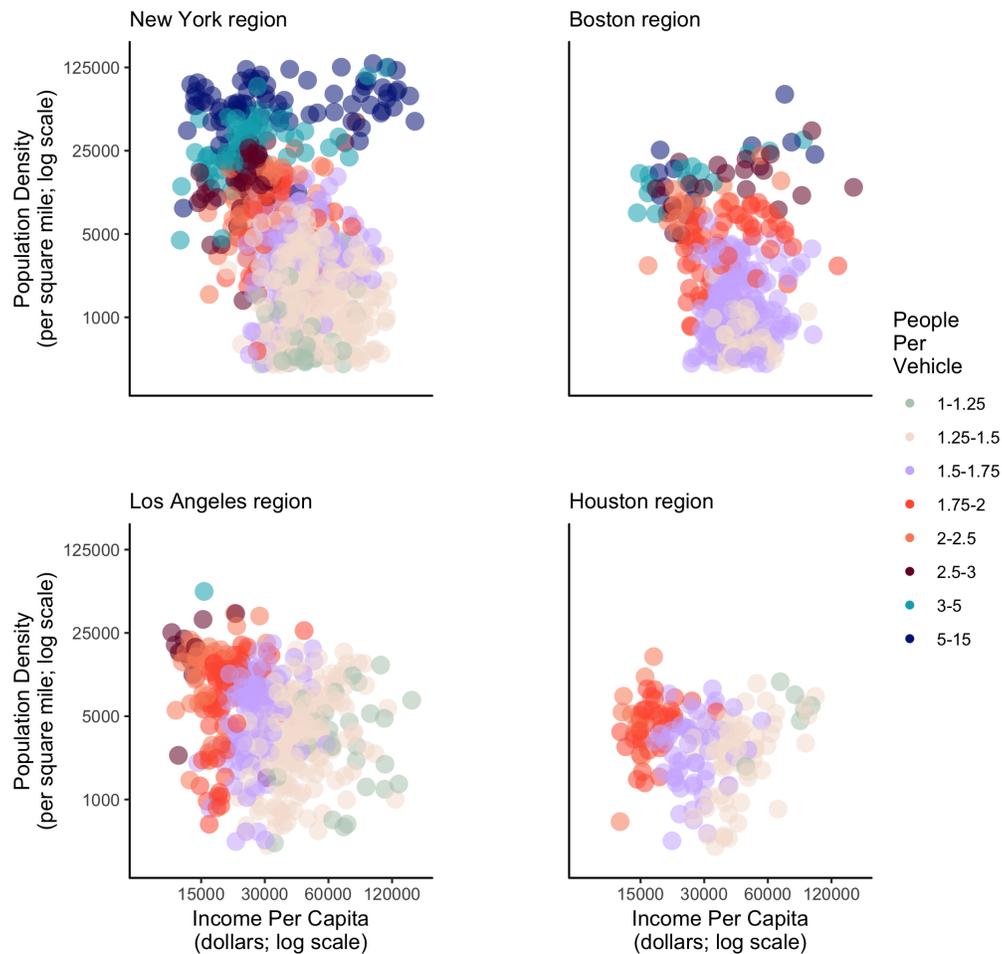
<sup>4</sup> <http://www.mncompass.org/profiles/city/st-paul>

# What drives variation in car ownership in St. Paul?

## Income v Density

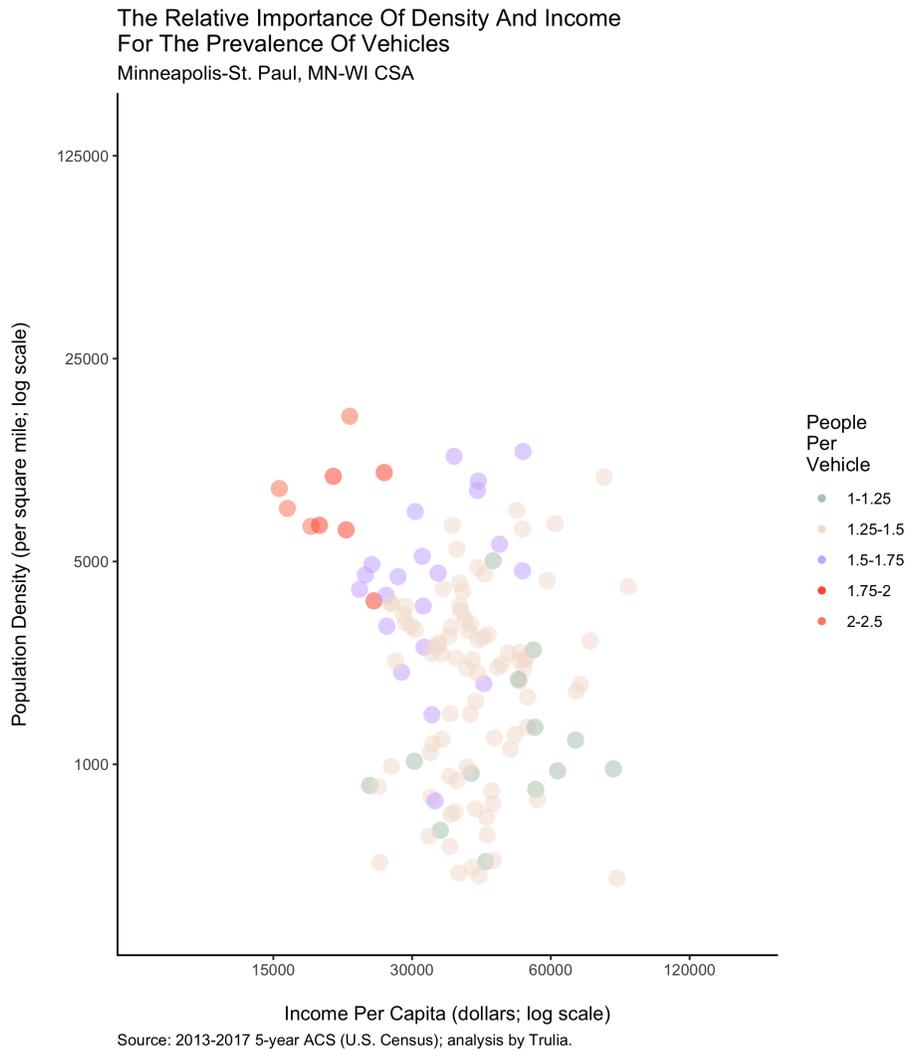
Cities across the United States generally follow two broad distribution typologies:

- In **density-driven** cities such as New York or Boston, vehicle ownership is strongly correlated with density. People who live in the densest parts of those cities own the fewest vehicles, regardless of income level. In fact, those at the highest income levels tend to have the fewest vehicles.
- In **income-driven** cities like LA or Houston, car ownership is strongly correlated with income. The rich own cars, the poor do not.



Source: 2013-2017 5-year ACS (U.S. Census); analysis by Trulia.

The corresponding graph for Minneapolis-St. Paul<sup>5</sup> looks like this:



The graph for the Twin Cities Metro Area suggests somewhat of a mixed picture. Overall, there are only moderate correlations between income, density, and car ownership.

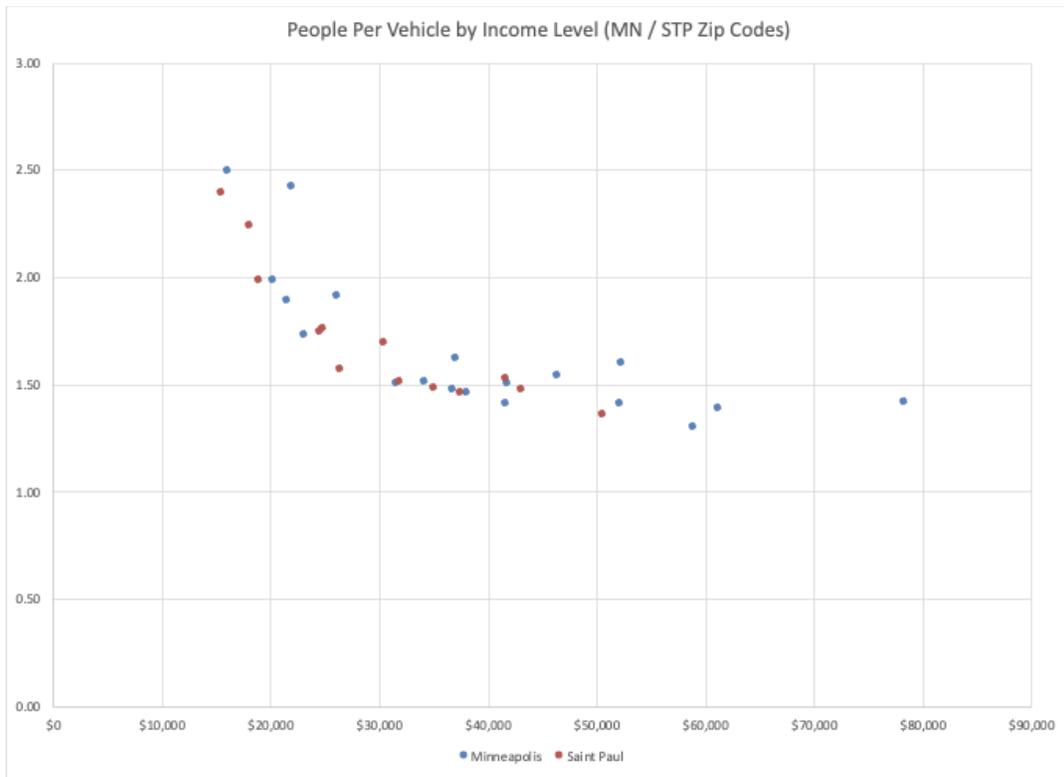
However, the lowest concentrations of vehicle ownership (red / orange dots) are strongly correlated with both income and density - **those least likely to own a car are poor households in urban neighborhoods.**

I downloaded the entire Trulia dataset<sup>6</sup> so that I could isolate the zip codes solely within the cities of Minneapolis and St. Paul vs. the region as a whole. The graph below illustrates this

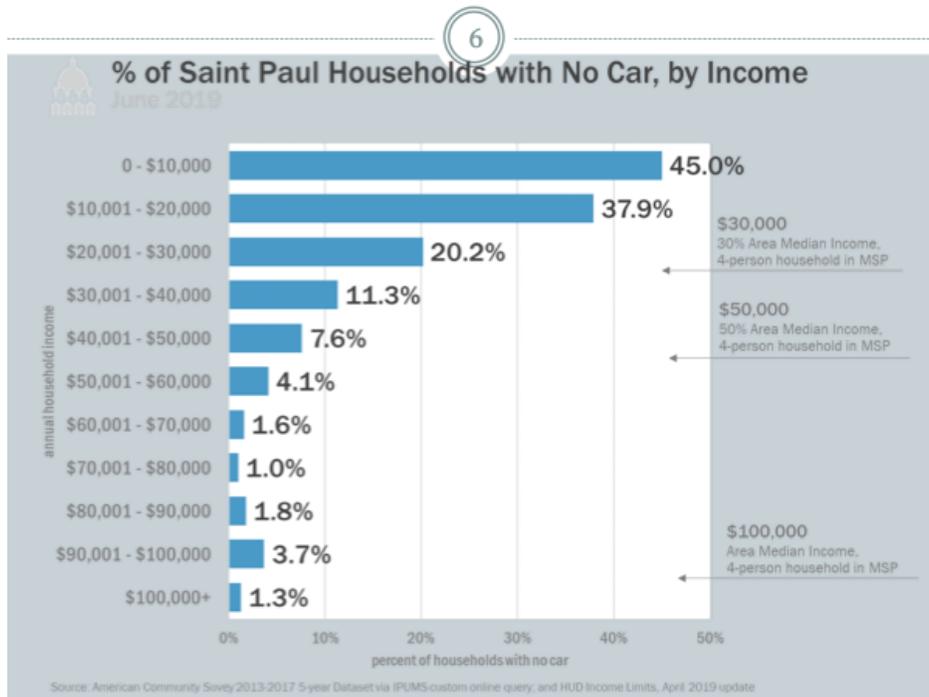
<sup>5</sup> Data from <https://www.trulia.com/research/people-per-vehicle-map/>

<sup>6</sup> I've uploaded the Trulia spreadsheet which includes the graph here: [Minneapolis and St. Paul Per Capita Vehicle Ownership](#).

effect much more clearly - average per capita vehicle ownership is relatively constant at most income levels, **dropping off sharply** at income levels below \$30k:



These figures are entirely in line with the City's presentation, which includes the following graph:

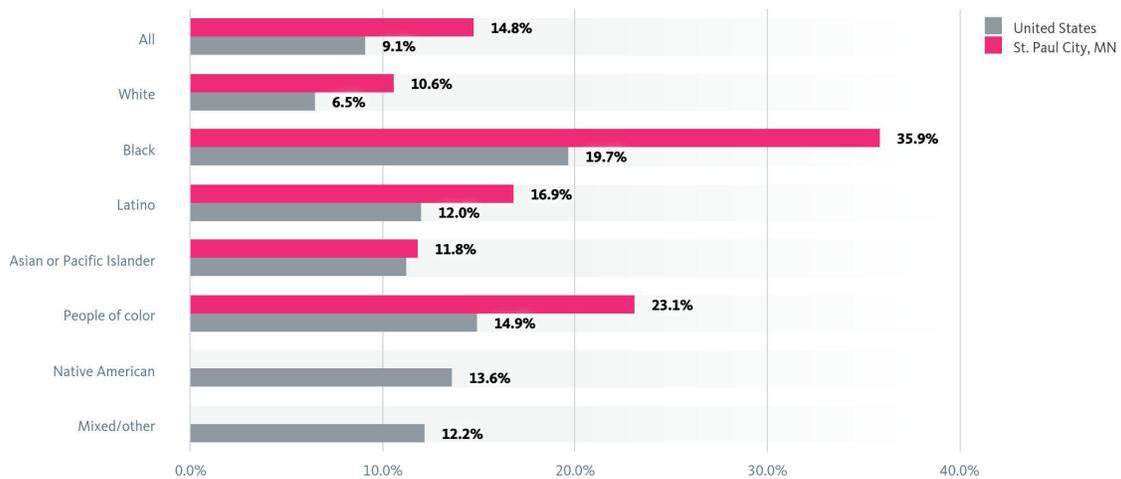


For context, according to the Minnesota Department of Labor and Industry, full-time individual earnings at minimum wage are currently approximately **\$20,500**<sup>7</sup>.

## Race / Ethnicity

Vehicle ownership is not only strongly correlated with income, it is also **strongly correlated with race/ethnicity**. While only 10% of White households do not own a vehicle in St. Paul, 35.9% of Black households and 23.1% of POC households overall do not.

Percent of households without a vehicle by race/ethnicity: United States vs. St. Paul City, 2015



IPUMS  
PolicyLink/PERE National Equity Atlas, [www.nationalequityatlas.org](http://www.nationalequityatlas.org)

## Summit Hill v St. Paul

It is worth noting that Summit Hill has significantly higher income levels and a lower proportion of POC households than St. Paul generally<sup>8</sup>:

<sup>7</sup> <https://www.dli.mn.gov/business/employment-practices/minnesota-minimum-wage-report>

<sup>8</sup> MN Compass - <http://www.mncompass.org/profiles/city/st-paul> and <http://www.mncompass.org/profiles/neighborhoods/st-paul/summit-hill>

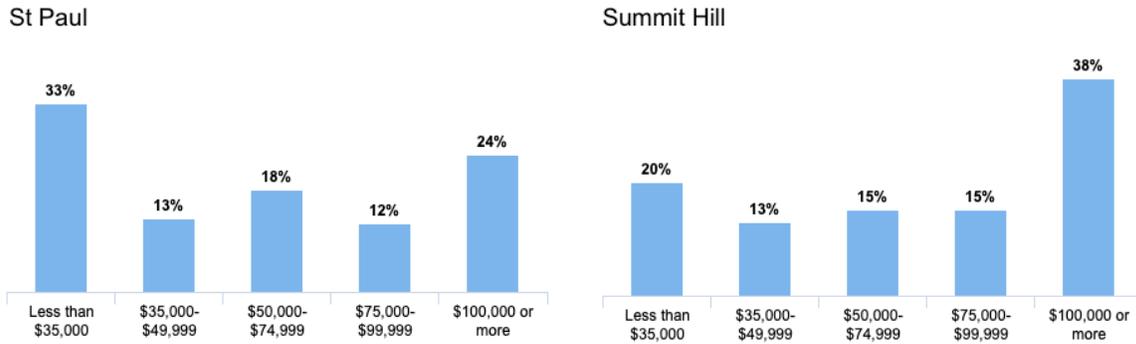


Chart showing income distribution for St. Paul and Summit Hill

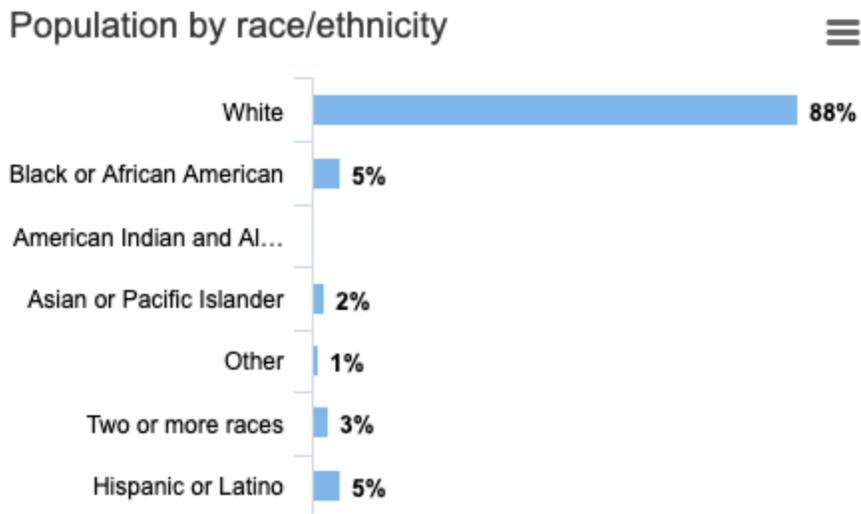


Chart showing population by race / ethnicity in Summit Hill

This creates two opposing dynamics:

- a) Current neighborhood residents likely own more vehicles and have a greater demand for parking than the citywide average.
- b) If we successfully diversify our neighborhood e.g. by providing more affordable housing options, it is likely that future parking demand per household will be less than it is now.

## Current Utilization

[Awaiting NCP parking study data and informal counts from Sonja, Brain etc.]  
 [Awaiting useful analysis from 1993 parking study]

## Target Provision

When both on-street and off-street parking are factored in, the total amount of parking, both in terms of existing built stock or what is required by code, is far in excess of the reasonable needs of residents alone. **Each single family home or duplex could park at least 3 vehicles by relying on on-street parking alone.**

On the other hand, there are three cases that require special consideration:

1. **Residential housing on or adjacent to commercial corridors.** The parking needs of the commercial corridor diminish the practicality of counting on-street parking towards residential requirements.
2. **Existing non-conforming multi-family buildings** - some of the existing pre-war buildings, particularly those along Grand Ave. actually provide less parking than is required by current code. Given that these buildings are often competing with commercial uses for space (e.g. retail), this has the greatest potential to create shortages.
3. **New infill multi-family developments at market rate.** As density increases, the same amount of on-street parking must be divided between more households. If new multi-family developments are not required to provide off-street parking to meet most or all of their projected needs, even a small number of these can **quickly overwhelm** available on-street parking<sup>9</sup>.

It is also important to consider the parking needs of **visitors and service / delivery vehicles** in addition to the base residential need when evaluating target provision. If all available parking spaces are already occupied by residents, it is impossible for visitors to find parking.

## Choosing a Target Utilization Rate

100% utilization is desirable for **assigned, off-street parking**. The goal is to reduce or eliminate total over-provision. As with other housing features like the number of bedrooms or bathrooms, tenants or owners will generally self-select properties with the features which most closely meet their needs.

On-street parking is a more complex topic. Most studies seem to recommend maximum utilization goals of **approximately 85%-90%**, above which finding an open spot is unlikely.

From the West 7th Parking Study:

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<sup>9</sup> See Brian Wenger's calculations, based on our RM zoning spreadsheet.

“These ranges were selected to pinpoint where parking becomes noticeably difficult and scarce. With parking occupancy under 50 percent, the available supply is abundant, and parkers will be able to find a space without having to circulate and/or attempt parallel parking maneuvers. With parking between 51 and 65 percent, an ample number of parking spaces is still available, but there are so few that parallel parking is likely. At 66 to 85 percent, there are so few available spaces that parallel parking is necessary, and at higher than 85 percent, finding an available on-street parking space is nearly impossible.”

Given the need to leave spare capacity for visitors and service / delivery vehicles, target spare on-street capacity should be lower - perhaps in the next range down i.e. **66-85%**.

[Needs further research + parking studies in order to make recommendations]

## Summary

1. Vehicle ownership in St. Paul overall is significantly lower than the national average. 14.8% of households in St. Paul do not own a vehicle at all, and 39.6% have access to only one vehicle. Unlike transit-centric cities, in St. Paul not owning a car is strongly correlated with low income levels, between 20% and 45% of the population at income levels of \$30,000 and below. Vehicle ownership is also strongly correlated with race - 36% of Black households and 23% of POC households do not own a vehicle.
2. Existing code requirements significantly exceed nominal demand for parking across a variety of residential housing types. Most new developments are required to provide a minimum of 1.5 off-street spaces per unit, exceeding the existing parking needs of 55% of the population. Much of the existing SFH / Duplex stock in Summit Hill is built *in excess* of code requirements, with 2+ off-street spaces per household common.
3. When on-street parking provision is factored in, almost 6 spaces are available per typical single family home, and almost 4 per unit in a duplex. This is likely significantly in excess of actual need for typical residential neighborhoods, even when spare capacity and the needs of visitors and service vehicles are considered. Reducing parking requirements for new or re-developed single family homes and duplexes would likely encourage moderate additional density to be distributed throughout existing mature neighborhoods, away from the main commercial corridor, without creating parking shortages.
4. Parking shortages are of concern, however, in specific places: 1) around new multi-family infill developments, 2) where there are a large number of grandfathered

apartment buildings with existing shortfall per code, or 3) where existing residential uses are adjacent to commercial uses with insufficient off-street parking. Reducing parking requirements for infill RM buildings in districts outside of the central transit corridor along University Ave. is likely to exacerbate existing parking concerns along existing mixed-use commercial corridors such as Grand Ave.

## Implications for Our Letter

- Residential and commercial parking are separate topics and should be addressed in their own sections.
- We should abandon any assertions we currently make based on parking *shortfall* analysis, unless and until we can bring forward evidence of actual parking *shortages* and quantify the degree of residential shortfall in our existing multi-family residential housing stock.
- It is likely possible for us to support targeted reductions in minimum parking requirements within areas zoned for lower density such as SFH and duplexes without any serious risk of exceeding demand in those areas.
- Concern should be targeted towards the identified areas of specific risk - i.e. new market rate multifamily developments, especially those along existing commercial corridors such as Grand Ave. Consideration should also be given to 'spillover' effects and how to address them e.g. by maintaining existing parking permit zones.
- We should address race / ethnicity in our analysis of how changes to the parking code might affect specific sub-groups. We should also modify our income analysis to discuss housing affordability for low-income groups as well as comparative cost-of-ownership for vehicles vs transit options.
- We should reconsider our recommendations for ramped reductions for affordable housing. We should formulate a policy recommendation for market-rate multi-family developments, and then seek to modify that proposal to meet the likely parking needs for affordable developments (or market rate developments that include some proportion of affordable units).

**GRAND AVENUE BETWEEN DALE AND LEXINGTON RT. 63 RIDERSHIP**

GRAND AVENUE BETWEEN DALE AND LEXINGTON RT. 63 RIDERSHIP									
	Fall 2019					Fall 2019			
<u>Grand Between Dale and Lexington</u>	<u>Trips/Day</u>	<u>Schedule</u>	<u>Ons</u>	<u>Offs</u>		<u>Trips/Day</u>	<u>Schedule</u>	<u>Ons</u>	<u>Offs</u>
Subtotal, Eastbound Weekday	495	Weekday	215	207	Subtotal, Westbound Weekday	486	Weekday	195	212
Subtotal, Eastbound Saturday	441	Saturday	122	150	Subtotal, Westbound Saturday	432	Saturday	136	120
Subtotal, Eastbound Sunday	432	Sunday	90	104	Subtotal, Westbound Sunday	432	Sunday	107	86
Total, Eastbound Rt. 63 (9 Stops)	1368		426	461	Total, Westbound Rt. 63 (9 Stops)	1350		438	418
Per Trip Per Stop Ons and Offs			0.31	0.34	Per Trip Per Stop Ons and Offs			0.32	0.31

**COMPARATIVES, LOCAL MAJOR TRANSIT NODES**

COMPARATIVES, LOCAL MAJOR TRANSIT NODES									
	Fall 2019					Fall 2019			
<u>Stop Name</u>	<u>Trips/Day</u>	<u>Schedule</u>	<u>Ons</u>	<u>Offs</u>		<u>Trips/Day</u>	<u>Schedule</u>	<u>Ons</u>	<u>Offs</u>
Dale & University Rt 65N	45	Weekday	173	62	Dale & University Rt 65S	46	Weekday	65	162
	39	Saturday	105	34		40	Saturday	37	101
	38	Sunday	88	28		39	Sunday	28	89
<b>TOTAL (1 Stop)</b>	<b>122</b>		<b>366</b>	<b>124</b>	<b>TOTAL (1 Stop)</b>	<b>125</b>		<b>130</b>	<b>352</b>
Per Trip Per Stop Ons and Offs			3.00	1.02	Per Trip Per Stop Ons and Offs			1.04	2.82
Snelling & Grand Rt 84N	32	Weekday	21	18	Snelling & Grand Rt 84S	31	Weekday	16	13
	26	Saturday	14	9		27	Saturday	10	16
	20	Sunday	14	7		21	Sunday	8	10
<b>TOTAL (1 Stop)</b>	<b>78</b>		<b>49</b>	<b>34</b>	<b>TOTAL (1 Stop)</b>	<b>79</b>		<b>34</b>	<b>39</b>
Per Trip Per Stop Ons and Offs			0.63	0.44	Per Trip Per Stop Ons and Offs			0.43	0.49
Snelling & University Rt 84N	32	Weekday	16	93	Snelling & University Rt 84S	31	Weekday	85	24
	26	Saturday	5	47		27	Saturday	58	19
	20	Sunday	6	41		21	Sunday	37	17
<b>TOTAL (1 Stop)</b>	<b>78</b>		<b>27</b>	<b>181</b>	<b>TOTAL (1 Stop)</b>	<b>79</b>		<b>180</b>	<b>60</b>
Per Trip Per Stop Ons and Offs			0.35	2.32	Per Trip Per Stop Ons and Offs			2.28	0.76
Snelling & Grand A Line N	105	Weekday	221	129	Snelling & Grand A Line S	107	Weekday	138	221
	102	Saturday	234	127		103	Saturday	135	219
	97	Sunday	152	99		99	Sunday	101	145
<b>TOTAL (1 Stop)</b>	<b>304</b>		<b>607</b>	<b>355</b>	<b>TOTAL (1 Stop)</b>	<b>309</b>		<b>374</b>	<b>585</b>
Per Trip Per Stop Ons and Offs			2.00	1.17	Per Trip Per Stop Ons and Offs			1.21	1.89
Snelling & University A Line N	105	Weekday	668	525	Snelling & University A Line S	107	Weekday	542	599
	102	Saturday	546	448		103	Saturday	424	505
	97	Sunday	417	335		99	Sunday	321	395
<b>TOTAL (1 Stop)</b>	<b>304</b>		<b>1631</b>	<b>1308</b>	<b>TOTAL (1 Stop)</b>	<b>309</b>		<b>1287</b>	<b>1499</b>
Per Trip Per Stop Ons and Offs			5.37	4.30	Per Trip Per Stop Ons and Offs			4.17	4.85

Source: Metropolitan Council, average daily boardings and alightings from early September to December

Trips: Number of scheduled trips. Note: all had adequate APC (automatic passenger counter) data observed

Ons: Average daily boardings

Offs: Average daily alightings

**RICHARD P. KELLER**  
23 St. Albans Street South. St. Paul, Minnesota 55105  
[rpkeller3@gmail.com](mailto:rpkeller3@gmail.com)

June 30, 2021

<[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)>

cc: Council Member Rebecca Noecker <[Ward2@ci.stpaul.mn.us](mailto:Ward2@ci.stpaul.mn.us)>

Re: 695 Grand Avenue, St. Paul, MN  
(21-271-810 695 Grand Rezoning)

Dear Zoning Committee:

I am a retired lawyer who has lived on St. Albans Street South between Summit and Grand for over 40 years.

The requested variances for 695 Grand represent not an ordinary “adjustment” of applicable rules and regulations, but a complete policy change for what kind of real estate development is permissible on Grand Avenue.

The East Grand Avenue Overlay District (EGAOD) limitations were thoughtfully and carefully adopted, some say in response to an inappropriate and much disliked structure at 745 Grand Avenue. Now, a developer wants to inflict greater damage on our neighborhood than 745 Grand ever did.

In the midst of the worst pandemic in 100 years a local landowner who allied with a large developer, is now attempting to overwhelm the neighborhood with a massive structure that in no way complies with the EGAOD limitations. Their “public meetings” were held only by Zoom calls, which, while said to be legally adequate, did not permit everyone in the neighborhood to participate nor to express their opinion and did not in any way allow for the full expression of viewpoints of the people who live closest to the project. It is not right and clearly violates our fundamental American notions of due process and fairness/equity to allow major policy matters decisions to be made or changed, with the public having only been allowed access via a much restricted Zoom meeting.

I am old enough to be aware that in an earlier decade, idealistic and educated planners and government officials brought forth something called Urban Renewal, and that policy, though lauded at the time, was later recognized as having wrought much ugliness on many communities and, as we now know, even the destruction of some vibrant neighborhoods, such as our own Rondo Avenue. Let’s not repeat the worst of Urban Renewal under the guise of policies of “densification” and “urbanization” and “environmentalism.”

I request that you Respect and Follow the Rules: kindly perform your assigned task of protecting and enhancing the neighborhoods in our City by respecting and following the rules and only make alterations and grant variances after traditional and far more appropriate

opportunities for public participation, including comments, questions and discussions in a professionally moderated environment.

Respectfully submitted,

/s/ Richard Keller

PS I believe that people in this neighborhood do not oppose development of the 695 Grand Avenue site as long as it complies with existing rules and regulations, in particular, the East Grand Avenue Overlay District limitations. Almost all of us support the development and construction of more housing within the City (for example, the condominiums on Grand near Oxford, known as “Oxford Hill,”) but only in the way that St. Paul has traditionally done so: carefully, thoughtfully, listening to and respecting the voices of both the immediate as well as the extended neighborhood.

**From:** [Howard Quinlan](#)  
**To:** [Butler, Sonja \(CI-StPaul\)](#); [\\*CI-StPaul PED-ZoningCommitteeSecretary](#)  
**Subject:** Public Comment on 695 Grand/Dixies Project  
**Date:** Wednesday, June 30, 2021 12:03:38 PM

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I oppose the proposed 5 story apartment/mixed use building at 695 Grand. The project is too big and will hurt the neighborhood including Grand Avenue. I support a mixed use development built within the East Grand Avenue Overlay requirements.

Please do not allow this project to go forward.

Howard Quinlan  
223 Avon St. S.  
St. Paul, MN 55105

Jennifer L. Miller  
23 St. Albans Street South. St. Paul, Minnesota 55105  
[jenmil68@gmail.com](mailto:jenmil68@gmail.com)

June 30, 2021

<[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)>

cc: Council Member Rebecca Noecker <[Ward2@ci.stpaul.mn.us](mailto:Ward2@ci.stpaul.mn.us)>

Re: 695 Grand Avenue, St. Paul, MN. ([21-271-810 695 Grand Rezoning](https://www.ci.stpaul.mn.us/2021/06/30/695-Grand-Avenue-Rezoning/))

Dear Zoning Committee:

I am a professional planner who has lived on South St. Albans near Grand for over 20 years.

I made a serious effort to participate in the Zoom meetings held by the developer and the Summit Hill Association (SHA). I was displeased by the lack of fairness in the way those meetings were handled.

With respect to the developer meetings, the comments of some participants were arbitrarily and inappropriately either hidden or not acknowledged nor addressed. When some of us tried to ask what must have been considered more “pointed” and, of course, relevant, serious questions, we were either ignored or treated with responses such as “that’s already been covered.”

The SHA allegedly took several votes on various aspects of the 695 Grand Avenue proposal. Amazingly, long time and concerned, responsible tax paying citizens who lived within so-called “proximity” to 695 Grand Avenue were denied the right to vote on the project. The people who live close to Grand Avenue or the site of any new development have as much of a fundamental right to be involved, to participate, and to vote as any American citizen does with respect to any Governmental action affecting them.

I request that you follow professional standards for inclusive planning and for the proper administration of a great City’s government: protect our city, enforce East Grand Avenue Overlay District limitations. Do not even think about modifying or changing those limitations until in-person, public meetings have been held with a trained government employee moderating and only after extensive opportunity for all citizens, especially those closest, to ask questions, be informed, participate and communicate with their elected representatives.

Very truly yours,

/s/ Jennifer L. Miller  
Jennifer L Miller

Adrian P. Keller-Miller  
23 St. Albans Street South. St. Paul, Minnesota 55105  
<redone101@gmail.com>

June 30, 2021

<[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)>

cc: Council Member Rebecca Noecker <[Ward2@ci.stpaul.mn.us](mailto:Ward2@ci.stpaul.mn.us)>

Re: 695 Grand Avenue, St. Paul, MN  
(21-271-810 695 Grand Rezoning)

Dear Zoning Committee:

I am a registered voter in the City of St. Paul and I have lived on St. Albans Street South for over 15 years.

I oppose the proposed development at 695 Grand Avenue and I request that you deny the grant of any variances with respect to that property.

Respectfully,

/s/ Adrian P. Keller Miller

**From:** [Pj Bensen](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#); [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Fwd: vote No to 695 Grand Proposal  
**Date:** Wednesday, June 30, 2021 10:56:01 AM  
**Attachments:** [attachment 1.pdf](#)

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Please add the email and attachment to the public record.

Thank you.

Pamela Bensen

Sent from my iPhone

Begin forwarded message:

**From:** PJ Bensen <pjbensen@gmail.com>  
**Date:** June 29, 2021 at 10:33:42 PM CDT  
**To:** cedric.baker@gmail.com, adejoy@esndc.org, kristinemariongrill@gmail.com, nmhood@gmail.com, luiserangelmorales@gmail.com, jake.reilly76@gmail.com, Usstmc@gmail.com, simon.taghioff@gmail.com, aquanettaa@gmail.com, tramhoang.sppc@gmail.com, blindeke@gmail.com, gmcmurtrey07@gmail.com, k.mouacheupao@gmail.com, aperryman@genesysworks.org, mieeta@gmail.com, jeff.risberg@gmail.com, wendylunderwood@gmail.com, zhijun.yang@metrostate.edu  
**Subject:** vote No to 695 Grand Proposal

Hello-

I'm a long time resident of this community. I initially came here as a renter roughly 10 years ago, and have now owned three different condos/homes in the area. This proposed project is unacceptable and is not compatible with what drew me to the Summit Hill neighborhood.

The future of our neighborhood depends on your vote to DENY the application to rezone. Please see attached document for more detailed objections, and make it a part of the public record.

THANK YOU-

Pamela Bensen  
682 Summit Ave.  
St Paul MN 55105

Sent from my iPad

## **Re: Dixie's Development Proposal**

### **I. Introduction**

The City of Saint Paul, the Summit Hill Association and the Grand Avenue Business Association have spent years studying this neighborhood, this business district and they have compiled thoughtful, comprehensive policies to protect this unique neighborhood, promote business development, and address situations like this.

The property at issue here – 695 Grand Avenue – falls within several pre-existing zoning and overlay districts that control this decision-making process. The proposal envisions a five-story mixed use building, with retail on the first floor and 80 apartment units on the top floors. They plan for 99 enclosed parking stalls. The proposed square footage of the project is 151,000.

This project **does not** comply with the Summit Hill/District 16 Neighborhood Plan and **does not** comply with the Summit Hill Association endorsed and St. Paul City Ordinance ([67.600](#)) for the East Grand Avenue Overlay District (“EG”). As a result, to accomplish this project, the owners seek to change the B2 zoning to T3 zoning and to request a rezone out of or variances from the East Grand Avenue Overlay District (“EG”).

This proposed development, and the consequential zoning and variance decisions, will have implications and precedence for future development up and down Grand Avenue for the next 100 years. Much care and discretion must be exercised in reviewing this proposal to ensure that it complies with the laws and existing community endorsed plans. Of relevance are pronouncements by the City of St. Paul Zoning Code, the City of St Paul’s 2040 Comprehensive Plan (“2040 Comp Plan”), the Summit Hill/District 16 Neighborhood Plan (“Summit Hill Plan”), and the East Grand Avenue Overlay District (“EG”) and the affirmation of the EG in the most recent community survey conducted by the Summit Hill Association.

This project literally complies with none of these guiding documents and is a monumental departure from the character of the neighborhood and Grand Avenue that the Summit Hill Board is to preserve. To approve this project would mean the Planning Commission/Zoning Committee would be disrespecting the fundamental governing principles that the residents expect their representatives in the City of St. Paul to uphold.

To be clear, I am very much in favor of development, but not development that seeks to disregard the guiding principles we have all agreed to for this neighborhood. The project proponents have been excellent in working with the neighborhood to explain their project and make accommodations. That does not mean the project should move forward when it is fundamentally and clearly inconsistent with the guiding principles of this neighborhood as codified in the Summit Hill Plan and the EG.

## **II. The Proposed Project Does Not Comply with Zoning Requirements**

Currently, the relevant property is zoned B2 with EG applied. This designation permits mixed use development with a maximum height of 30 feet.

- *The proposed building is much higher at 60 feet.*
- *The setback criteria are not met from adjacent RT2 residential districts*

The Summit Hill Plan promotes the zoning of B2 sites. T2 is a parallel zone for commercial properties and is supported in the Summit Hill guidelines. The Summit Hill guidelines curtail the use of B3 and its parallel T3 zoning; in fact, the policy states that no additions of B3 zoning should be approved. Summit Hill guidelines also provide that B3 properties should be re-zoned to B2 zoning when such properties are developed for B2 uses.

- *The proposed building needs T3 zoning as it is not allowed in B2 and T2.*

This property lies within the EG. EG is designed to preserve the historic character of East Grand Avenue. This zoning overlay district was the result of a recommendation that was incorporated in the current Summit Hill Plan and was a reaction to and repudiation of the Oxford Hill Condominium development at the corner of Oxford and Grand Avenues. Many residents felt Oxford Hill was too tall and too massive. As a result of what happened with the Oxford Hill building, the code further specifies that there will be no additional heights allowed for setbacks. The maximum building footprint to be no more than 25,000 square feet and the total building size, above ground, of 75,000 square feet. This recommendation was approved by the Planning Commission and City Council in 2006 and was incorporated into the **City of St. Paul Zoning Code** Article VI, 67.600. It limits mixed use building heights to 36 feet. There is no additional height allowed for setbacks. There are no parking exceptions allowed.

- The proposed building **is double** the allowable size at 151,000 square feet and 33% larger than the footprint of Oxford Hill (CVS and Starbucks building) and 25% taller than the same Oxford Hill.

## **III. Because the Project Does Not Comply with Zoning Requirements, the Owner Asks for Multiple Exceptions in the form of Rezoning AND Variances – None of Which Meet Standards for These Exceptions**

### **Change of Zoning**

Because the project fails to meet the well-thought plans set forth by the City and Summit Hill, the owners/developers of 695 Grand propose changing the B2 zoning to T3 (“Traditional Neighborhood”) zoning and request a rezone out of the EG.

For a situation such as this, the City of Saint Paul has established project design standards (Sec. 66.343) that take precedence “unless the applicant can demonstrate that there are circumstances unique to the property that make compliance impractical or unreasonable.” The developers have

failed to meet this burden. In particular, this proposal fails to transition to the density in this area. The policy states that “Transitions in density or intensity shall be managed through careful attention to building height, scale, massing and solar exposure.” ([66.343 \(b\)\(2\)](#))

- *The proposed development is surrounded by residential units on all sides.*
- *Also, the largest mass and tallest and longest walls are on west, north and east side of the development, all bordering on residential units. The solar orientation is backwards and casts maximum shadows.*

In addition, in evaluating rezoning proposals, the City of Saint Paul considers:

- Compatibility with land use and zoning classification of property within the general area.
- The trend of development in the area of the property in question.
- Consistency with the 2040 Comp Plan and Summit Hill Plan.
- Suitability of the property for the uses permitted under the existing zoning classification.
  - o Existing zoning classification already make this property suited to build a mixed-use building. Economic considerations are the only reasons to request to rezone to T3 to allow the developers to exceed the current height guidelines.
- [66.331](#) Footnote (e) states that structures cannot exceed 25 feet in height along rear property lines if they abut RT2 residential districts, which is the case here. Structures can only exceed that height of 25 feet if stepped back ‘a distance equal to the additional height’.

None of these considerations are met.

### **Application for a Variance**

Furthermore, this development has requested a variance. A Conditional Use Permit (“CUP”) may be granted if the following findings are met:

1. The variance is in harmony with the general purpose and intent of the zoning code.
2. The variance is consistent with the comprehensive plan.
3. The applicant has established that there are practical difficulties in complying with the provision, that the property owner proposes to use the property in a reasonable manner not permitted by the provision. Economic considerations alone do not constitute practical difficulties.
4. The plight of the landowner is due to circumstances unique to the property not created by the landowner.
5. The variance will not permit any use that is not allowed in the zoning district where the affected land is located.
6. The variance will not alter the essential character of the surrounding area.

The developers have failed to establish these findings. To continue to support their application, the developer’s request that these conditions be modified. In order to modify CUP conditions, one must generally find that “[t]he extent, location and intensity of the use will be in substantial compliance with the 2040 Comp Plan and any applicable subarea plans which were approved by the city council; and “[t]he use will not be detrimental to the existing character of the development in the immediate neighborhood or endanger the public health, safety and general welfare.” ([61.500](#))

More specifically, the governing body must find “exceptional undue hardship of the landowner” and must find the new use to be “consistent with the reasonable enjoyment of adjacent property.” (61.502) Applying these standards to the current proposal warrants a refusal for a CUP. Specifically, I believe:

- *the use is NOT in substantial compliance with the 2040 Comp Plan;*
- *the use is NOT in substantial compliance with the EG, which is result of a small area plan;*
- *the use is NOT in substantial compliance with the Summit Hill plan, which called for the EG and called for B2/T2 as “top zoning”;*
- *the use WILL be detrimental to the existing character of the development in the immediate neighborhood;*
- *the use WILL affect the historic nature of the area; and*
- *the use WILL prevent reasonable enjoyment of adjacent properties.*

### **Incompatibility with City 2040 Comp Plan**

The City of Saint Paul has studied these issues and recently issued a **2040 Comp Plan**. This proposed project does not meet its land use and housing criteria; examples include:

**Policy LU-29.** Ensure that building massing, height, scale and design transition to those permitted in adjoining districts

**Policy LU-36.** Promote neighborhood- serving commercial businesses within Urban Neighborhoods that are compatible with the character and scale of the existing residential development

**Policy H-14.** Encourage the use of low-impact landscaping, such as no-mow yards, native landscaping and rain gardens, to reduce the consumption of natural resources in yard maintenance and encourage the use of yards as carbon sinks.

**Policy H-47.** Encourage high-quality urban design for residential development that is sensitive to context, but also allows for innovation and consideration of market needs.

**Policy H-50.** Balance the market demand for larger homes in strong market areas with the need to maintain a mix of single-family housing types that is sensitive to the surrounding neighborhood context.

### **IV. Objections Summarized**

The developer proposes a 5-story, 80-unit, 116-bedroom multi-family building that would be out of character and scale compared to the rest of the surrounding area, with potentially large negative impacts with regard to parking spillover into an already parking-challenged area, increased alley traffic, potential water run-off issues, as well as blocking light/creating shadows across nearby properties due to its height and smaller setbacks, and almost entirely eliminating green space.

As proposed, this building would be grossly out of character with the surrounding area:

- It would be a tall building, looming over adjacent properties, eliminating privacy in back yards for at least a block in all directions, blocking light and air flow, and creating shadows across entire lots because of its height;
- Aside from its height, its huge mass, nominal proposed setbacks, would be a notable anomaly and interrupt the texture and flow of the adjacent blocks and neighborhoods; and
- It virtually eliminates green space between its footprint, and the impervious materials used in the very narrow area between the sidewalk and proposed building.

There is nothing that precludes the developers from using this property for a building which conforms to the zoning code, and it is clear that in fact, economic considerations are driving their desire to build a structure that is too large for the lot, cannot support the parking requirements attendant on the proposed density, and would be massively out of character with the surrounding area (see photos below). A three-story building would be a more suitable use for a lot this size and would not require the requested variances to function on this particular property. This option can be economically feasible, and I encourage the St. Paul City Planning Commission and Zoning Committee to gather residents with development expertise to assist the developer on this if desired by the owners.

Analysis of many, varied City statutes and studies confirm that this proposed development should not proceed as designed. This design ignores the unique historical nature of our neighborhood. The design thwarts the expressed preference of Summit Hill neighbors; a recent survey showed that 50% of SHA residents want to keep the EG in its entirety and only 18% wanting to reject it.<sup>1</sup> The residents have made their thoughts and concerns known to our elected officials who should honor those preferences.

Factually, this project runs counter to many safeguards that have been in place for years in order to protect the unique and special area that is our neighborhood. To recap my objections - they are:

1. The building size, bulk and site planning.
  - a. The proposed building is too tall, too big and not in scale with the surrounding area.
    - i. Current zoning caps a building's height at 36 feet; this proposed building stands at 59 feet 10 inches.
    - ii. It is too dense.
    - iii. It is positioned too close to the alley.
    - iv. Its height is in the wrong places, casting maximum shadows.
2. The negative impact it will have on the neighborhood
  - a. The size of this proposed development will impact traffic, parking and safety in the area. Recent parking studies showed parking in this block of St. Albans is already at capacity.

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<sup>1</sup> The remaining 32% wanted to keep the EG with some changes, but there is no specificity as to the changes, including whether they were seeking more or less intensification of building on Grand. Public meetings showed that there was interest on both sides.

- i. The developers show 68 parking stalls for 80 apartments with 116 bedrooms. There will be a likelihood of 2-car families/residents given the type of units being built and the cost. Those who can afford these rents will have cars.
    - ii. The developer also shows just 31 stalls for three retail restaurants.
    - iii. Residents will necessarily need parking on the surrounding streets. There is no parking available because of the already intensely parked adjacent streets.
  - b. The size and design of this project will lessen the neighborhood character; the unique, charming and historic character will be diminished, and the adjacent property values will likely fall as well.
    - i.
- 3. Its noncompliance with existing laws and zoning rules as detailed above.
- 4. The absence of any real understanding of the parking issues in this area

This large-scale project will exacerbate already existing parking shortfalls in this area.

- a. Existing restaurants are required to provide 60 parking spots with 9 made available for employees. This proposal includes 31 parking spots with no additional spots for employees.
- b. The proposal includes 80 units (with 116 bedrooms) and 68 parking spots. The provision of less than one parking spot per unit is inadequate. There will be more than one person in many of the apartments and they will have cars.
- c. The claim that residents will exclusively bike or walk to work is unrealistic. This intensification will add to a parking shortfall that already exists here. The same holds true for bus usage.<sup>2</sup>
- d. There is no concession made for the traffic generated by delivery trucks, garbage/recycling trucks, and other operations-related traffic. I will forward current pictures to explain the problem with the proposal.
- e. Grand Avenue is the same width for its entire length, approximately 54 feet. The road widths of other St Paul streets with larger developments are substantially wider; Snelling is 100 feet wide; Marshall is 80 feet wide on its west end and 60 feet on its east end; and University is 120 feet wide.
- f. St Albans is a narrow one-way street (32 feet wide) with nearly 100% on-street parking occupancy. This will make traffic flow extraordinarily difficult. The City has determined that the area of Grand and Dale has one of the greatest parking shortfalls/parking intensifications in the City. In addition, during the height of COVID, when there was no indoor dining, St. Albans and other surrounding streets were fully parked in the evenings with residential parking.
- g. The increased traffic, parking and pedestrian safety issues that accompany increased density could actually drive potential visitors to Grand Avenue away.

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<sup>2</sup> Grand Avenue has one low frequency bus route #63. The route recently reduced its number of stops; there is no stop at St. Albans. Route #63 has below-average utilization in a bus system that saw a 4.5% reduction in ridership and a 1.4% reduction in total transit usage in 2018. Route #63 has a frequency of 20 minutes or more most days. Only during rush hour does the frequency increase to 10 to 20 minutes. Stated another way, 77% of the time Route #63 has a frequency of 20 minutes or more. Also, bus stops have been removed from Grand Avenue, including the one at the corner of St. Albans and Grand, adjacent to this project's location.

## V. Conclusion

Developing a project at this site is possible and desirable. Current zoning B2 allows a 3-story mixed use project that could create new housing, provide updated space for the restaurants, improve street and sidewalk connections (instead of the large parking lot at the corner). Staying in existing zoning would create positive impacts for Grand *and* St Albans, for businesses *and* residents. Also, this block is part of the “GrandenDale node” – Summit Hill’s most dense residential area. Further intensity proposed is well beyond what is feasible or appropriate for this intersection and disrespects the immediate neighbors and surrounding neighborhood.

This surrounding neighborhood is special. It is a historic neighborhood. Directly to the north is Summit Avenue, a locally-designated historic district created in the 1980s to protect the integrity and preserve this treasure that attracts visitors from all over the world. Similarly, the areas directly to the south of Grand Avenue are national- and state-designated historic districts, with protections in place to preserve the unique character of these homes. And, Grand Avenue, itself, is a state-designated district.

The scale of the neighborhood is consistently 2-3 stories high. There are two notable exceptions that should not be given any precedential weight here: the building at 745 Grand (Grand Place - a 6-story condo at Grotto & Grand built in 1981 when a gap in the zoning code allowed something like that to be built), and at 1060 Grand (a 4-story Oxford Hill development at Oxford & Grand which also took advantage of gaps in the zoning code.) Both of these examples have setbacks from the rear alley of more than 25 feet making these comparisons invalid. Also the EG specifically closed these gaps to regulate the heights.

For reference, below is the scale of proposed project in relation to surrounding buildings.



**From:** [Eric Ruhland](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](mailto:*CI-StPaul_PED-ZoningCommitteeSecretary)  
**Subject:** Re: Zoning variance at 695 Grand  
**Date:** Wednesday, June 30, 2021 1:52:55 PM

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Dr. Eric Ruhland  
Home-790 Summit Ave St Paul 55105  
St Paul Pet Hospital-Cathedral Hill-377 Dayton Ave St Paul 55102  
St Paul Pet Hospital-Highland-2057 Randolph St Paul 55105

On Wed, Jun 30, 2021 at 1:31 PM \*CI-StPaul\_PED-ZoningCommitteeSecretary <[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)> wrote:

Thank you for your comments. We ask that you include your address on testimony to be submitted into the public record. Thank you.

Samantha Langer

-----Original Message-----

From: [dr.ruhland@gmail.com](mailto:dr.ruhland@gmail.com) <[dr.ruhland@gmail.com](mailto:dr.ruhland@gmail.com)>  
Sent: Wednesday, June 30, 2021 12:32 PM  
To: \*CI-StPaul\_PED-ZoningCommitteeSecretary <[PED-ZoningCommitteeSecretary@ci.stpaul.mn.us](mailto:PED-ZoningCommitteeSecretary@ci.stpaul.mn.us)>  
Subject: Zoning variance at 695 Grand

My name is Eric Ruhland. I am a local home owner (790 Summit Ave), and local business owner(St Paul Pet Hospital).

I moved to St Paul over 8 years ago with the intention of starting a business and growing my family. I purchased my home on Summit Ave just over 7 years ago. During that time we have converted a dilapidated vacant home into a historic gem, and retrofitted an old photo development space into a veterinary hospital. I have obeyed every principle of historic preservation and thought that my local leaders believed the same thing. I seem confused by the recent push to turn this neighborhood into something it is not. I oppose this variance and ask that you do the same.

By passing these variances you are disregarding the sacrifice of generations of people before you and jeopardizing the sensitive and intimate relationship between an exclusive historic residential neighborhood and its associated business district. Not one home owner I have spoken to in a 3 block radius of this project is on board with the variance. NOT ONE! I dont think you will find another issue that will be so sensitive with such a lasting impact on our community.

Are we the next Uptown? The next North Loop? I hope with all of my soul we are not. Saint Paul has more history, character, and charm than that. I ask that you vote to reject these zoning variances proposed at 695 Grand Ave and others like it. We have not come all this way, being led by courageous leaders before us to bow to the pressure of the almighty dollar and chalk it all up for the progress of man.

Thank you.

Sincerely,  
Dr. Eric Ruland

Sent from my iPhone

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Dr. Eric Ruhland *owner*  
St. Paul Pet Hospital  
Cell: **651-238-6815**  
Office: **651-789-6275**  
Fax: **651-225-0869**

**From:** [AJ Jones](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** Oppose Dixies/695 Grand  
**Date:** Wednesday, June 30, 2021 11:47:33 AM

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I had sent an email against this project to the neighborhood committee, Summit Hill, voicing concerns of Grand Avenue employees. Representing people in Grand, who work late hours and need parking for safety, and I won't be able to afford these overpriced new apartments.

I saw that my email was included and I read a whole bunch of emails from a whole bunch of people.

There were way more people who were against this proposal than were for it. By a lot.

I don't understand how a neighborhood group can vote against what the majority of people who live and work and shop in the area wrote in? Doesn't seem democratic to me.

I hope that this committee will see how bad this project will be for Grand Avenue. The people who know and work and live and care about it have wrote in, y'all should listen.

AJ Jones  
St Paul

**From:** [Butler, Sonja \(CI-StPaul\)](#)  
**To:** [\\*CI-StPaul\\_PED-ZoningCommitteeSecretary](#)  
**Subject:** FW:  
**Date:** Monday, June 28, 2021 10:46:04 AM

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-----Original Message-----

From: gingerhgiefer1910@gmail.com <gingerhgiefer1910@gmail.com>  
Sent: Saturday, June 26, 2021 5:25 PM  
To: Butler, Sonja (CI-StPaul) <sonja.butler@ci.stpaul.mn.us>  
Subject:

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

I support a mixed use development that complies with the current zoning!

Sent from my iPhone