

St. Anthony Park Community Council/District 12  
P.O. Box 8124  
Saint Paul, MN 55108



To: Saint Paul City Council  
15 Kellogg Blvd. West  
310 City Hall  
Saint Paul, MN 55102

June 27, 2023

Re: FILE #: 23-035038 — 2285 Hampden LLC (c/o Thomas Nelson, Exeter Management LLC)

Dear Council President Brendmoen and City Council Members,

The St. Anthony Park Community Council supports building affordable housing in our neighborhood, particularly with a goal of an average AMI of 60% or lower, with a high number of two- and three-bedroom homes, as appears to be the case with this project. We are satisfied that this use, in the current economic environment, is best-suited to this site, which has been vacant for about five years.

Currently, more than 250,000 square feet of commercial space listed as Industrial/Flex Use is vacant within one-half mile of the site. Requiring 80% of the first floor to be commercial space ignores economic viability. Although one goal of the Industrial zoning category is to “be supportive of well-paying jobs” as stated in the BZA Staff Report, this is not being achieved for nearly 10 acres of empty space at the moment. It is conceivable that providing affordable housing for people who could fill some of those well-paying jobs would benefit Saint Paul’s economy better over the long run, as they build savings and move up to home ownership.

Because the site is on Hampden Avenue, we have some trepidation about the livability standard for residents because of the heavy truck traffic they will experience on a daily basis, given our research on this topic.(1)

However, we also know that any new commercial or industrial use at this site could also increase truck traffic in the neighborhood for existing residents, and so creating more affordable housing is the better choice, since residents come and go less often than business users and do not create more over-sized vehicle traffic.

Among the variances requested, we do not favor the existence of the surface parking lot, though we understand the developer’s rationale for it. If a surface lot is actually necessary for the commercial space and the housing offices, we would prefer the lot to be smaller. The building and its residents, we believe, would be much better off with green space in that location, since green space is lacking in that immediate area. The building is only three blocks outside of the Raymond Station area, and especially with the completion of a pedestrian and bike path north-south between Carleton Street and Long Avenue, it could have excellent non-motorized connection to the Green Line (the “Carleton Extension”). It also is less than 1,000 feet from a well-stocked grocery store. A moderately dense residential area abuts this site to the southwest.

Although we would like to see more green space in the plan, the early drafts of the proposed building show a setback that exceeds what is currently on the site. Two of the existing buildings meet the sidewalks. The neighboring building to the west is set back 9 feet from the sidewalk, which is consistent with what is being asked for in the present plan.

We have been concerned about the known contamination of soil and groundwater at the site, but the MPCA has determined “No Association” for a prior development plan at the site and has specified procedures that will minimize the risk of spreading contaminants during construction. There are reliable ways to prevent intrusion of vapors into the building, which undoubtedly will be required by the MPCA. Consequently, we agree that this location can be made safe for residential use and, for reasons stated elsewhere in this letter, that it will not pose a hazard to the families that will live here.

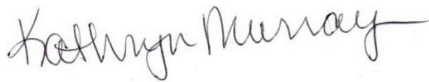
The development could help reduce the urban heat island effect of this industrial area by installing a reflective white roof or a green roof, which also would reduce stormwater runoff. Alternatively, with some 35,000 square feet of roof space and with current incentives for renewable electricity production, it would be financially feasible to install a solar photovoltaic array that produces far more than 100 kilowatts of energy. This, together with improved building insulation and energy-efficient HVAC and appliances, would reduce utility costs substantially.

The Staff Report argues that this property is “outside the Raymond Avenue Green Line Station Area” and therefore cannot be considered an acceptable conversion of land use as described in the West Midway Industrial Plan. As we point out above, this site is within easy walking distance (about 2000 feet) of the Green Line Raymond Station and many shops and restaurants, and it adds considerable population density (281 beds planned); we conclude that it fits the characteristics required for land conversion.

In closing, we hope our support for this project will allow for timely engagement about the design with the developer during the site plan process, if the project gets its initial approval.

Thank you for your consideration.

Sincerely,



Kathryn Murray, Executive Director  
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CC: Doua Yang, Ward 4 Legislative Aide  
Thomas Nelson, Exeter Management, LLC

- (1) In September 2020, the SAPCC Transportation Committee counted heavy truck traffic at several key intersections in South St. Anthony Park, after community complaints about the effect of their sound and air pollution. We plan to replicate these counts at the equivalent days and times this fall for comparison.

One of the corners we counted was Raymond and Hampden Avenues, about two blocks east of the 2285 Hampden site.

At that corner, we recorded 22.5 heavy trucks *per hour* from 1:00 to 3:00 p.m. on an average weekday, going east or west on Hampden to or from Raymond, which is more than one every three minutes. Note that this did not include any truck traffic originating/terminating in the industrial area north of Hampden that came from or went east on Hampden toward Vandalia/University.

That 22.5 trucks per hour number is almost identical to the number of trucks we counted around the same time on Territorial Road at Seal Street.

As Councilmember Jalali knows, SAPCC has written a letter to her and to Public Works about the effect of this heavy truck traffic on the residents along Territorial Road, many of whom live in affordable housing, such as Union Flats and Seal Hi-Rise.

Residents of both these buildings, in addition to the residents of the St. Anthony Greens townhouses along Territorial Road, express strong opinions about the negative effects of the incessant heavy truck traffic they live with every day.