



April 5, 2024

Mitra Jalali  
City Council  
City of St. Paul

Re: 1984 Marshall Avenue Rezoning ZF #24-017-011

Dear Council Member Jalai:

The Union Park District Council 13 met on April 3, 2024 and considered the request to re-zone 1984 Marshall from RM1 to RM2.

The District Council voted to oppose the request for the following reasons:

1. Brent Thompson, representing Mortho LLC came to our Land Use committee and stated that the city advised him to pursue a zoning change to RM2 rather than seek a variance within the current zoning of RM1 which would apparently be sufficient for the project he verbally described to us. He stated during the CLUED committee meeting he has no personal preference between RM2 or remaining RM1 and possibly utilizing variances for his project. He decided to pursue the RM2 zoning change upon the advisement of a city planning official as it would be an easier path forward. Union Park District Council is concerned by the presumptive reliance on city official statements by Mortho LLC before proper vetting, notification to the community, and analysis of the rezoning request could be conducted. Union Park District Council is also concerned that the recommendation of the city seeks an excessive allowance in proportion to the project described with permanent impact on the character of a community.
2. Brent Thompson did not provide renderings or plans of the proposed development, nor did he provide written documentation of the proposed RM2 zoning change on the property in question.
3. Comments received from community members at CLUED, as well as letters to UPDC, stated unanimous opposition to the RM2 zoning change. This community feedback is consistent with results Union Park District Council obtained from the community during the very recent deep engagement study in cooperation with the city in the West Marshall Ave Zoning Study of 2018. We caution the city from advising developers to pursue projects in a manner directly contradictory with a known position of the local community, especially when such information is provided in the form of a yearlong study.
4. While all of the attending community and written submissions oppose the RM2 variance change, Union Park District Council did receive community feedback that is amiable and even supportive of the same project should it be a simple variance request within the current zoning of RM1.

5. This request looks like spot zoning. It is providing an enhanced economic benefit for one specific investor who recently purchased this property with the intent of redeveloping it. There is only one single grandfathered property zoned RM2 in the 2 mile stretch from Miss River Blvd to Lexington.

6. This property is not on a city nor transportation node.

7. Since the West Marshall Avenue zoning study was completed eleven apartments with 375 units including 650 bedrooms have been added on Marshall Avenue in the 2km stretch between Finn and Pascal. The density of this area already exceeds the vision of the zoning study and the 2040 plan.

Thank you,

Sarah Dvorak, Union Park District Council President