



CONSULTANTS
• ENVIRONMENTAL
• GEOTECHNICAL
• MATERIALS
• FORENSICS

April 2, 2018

Saint Paul City Council
310 City Hall
15 West Kellogg Boulevard
Saint Paul, MN 55102

RE: Conditional Use Permit Appeal, 2103 Wabash, File Number 18-024-155,

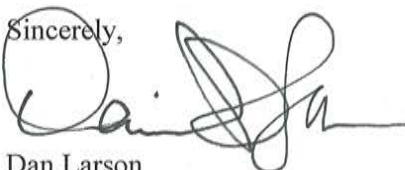
Members of the Saint Paul City Council:

American Engineering Testing, Inc. (AET) is requesting this letter and attachments be added to the public record as part of AET's appeal of the Planning Commission's approval of the Conditional Use Permit (CUP) for the 2103 Wabash project. Prior to granting the CUP, the Zoning Committee staff report (attached) recommended denial of the CUP and subsequently the Zoning Committee denied rezoning the project site from I2 to IT. Last week, the Midway Chamber of Commerce rescinded its support of the 2103 Wabash project (see attached letter) and reiterated its support of growing living wage jobs and increasing the tax base in the Midway.

AET has been a St. Paul Midway business for 28 years. Over the past 10 years, we have added 100 living-wage jobs (average salary of \$65,000) and now have a total of 240 engineers, scientists and staff working out of our corporate headquarters in St. Paul. In 2017, we purchased the Rihm Motors properties (567 Cleveland and 2108 University) directly east and north of the 2103 Wabash site. We plan to develop both sites and add an additional 100 plus jobs over the next 10 to 15 years. Note the east side of the 2103 Wabash building sits on the property line of our 567 Cleveland site. The future building we are planning will be under the I2 zoning designation and be situated toward the west side of the site.

The proposed 2103 Wabash project includes 64, market-rate apartments (many located on the first floor facing our property). The West Midway Industrial Area Plan (WMIAP) says the City should, "retain and protect current industrial land from conversions to non-industrial uses." The WMIAP also places great importance on improving buffering between existing "vulnerable land use edges" between residential and industrial properties to reduce conflicts and preserve industrial viability. In this case, there is no buffer between AET's industrial property and the proposed 2103 Wabash residential development.

The 2103 Wabash project will impede AET's future industrial viability and AET's normal and orderly use, development and improvement of our properties. Further, the CUP did not address issues of parking or the health, safety and welfare of the public. To place apartments in the middle of an industrial area without sidewalks and adequate parking, and with heavy truck traffic and an active railroad track endangers public safety.

Sincerely,


Dan Larson
Chairman and CEO

Attachments





 Zoning

 Rail Line



AMERICAN
ENGINEERING
TESTING, INC.



Scale:

AET Site and Area Map

American Engineering Testing, Inc.

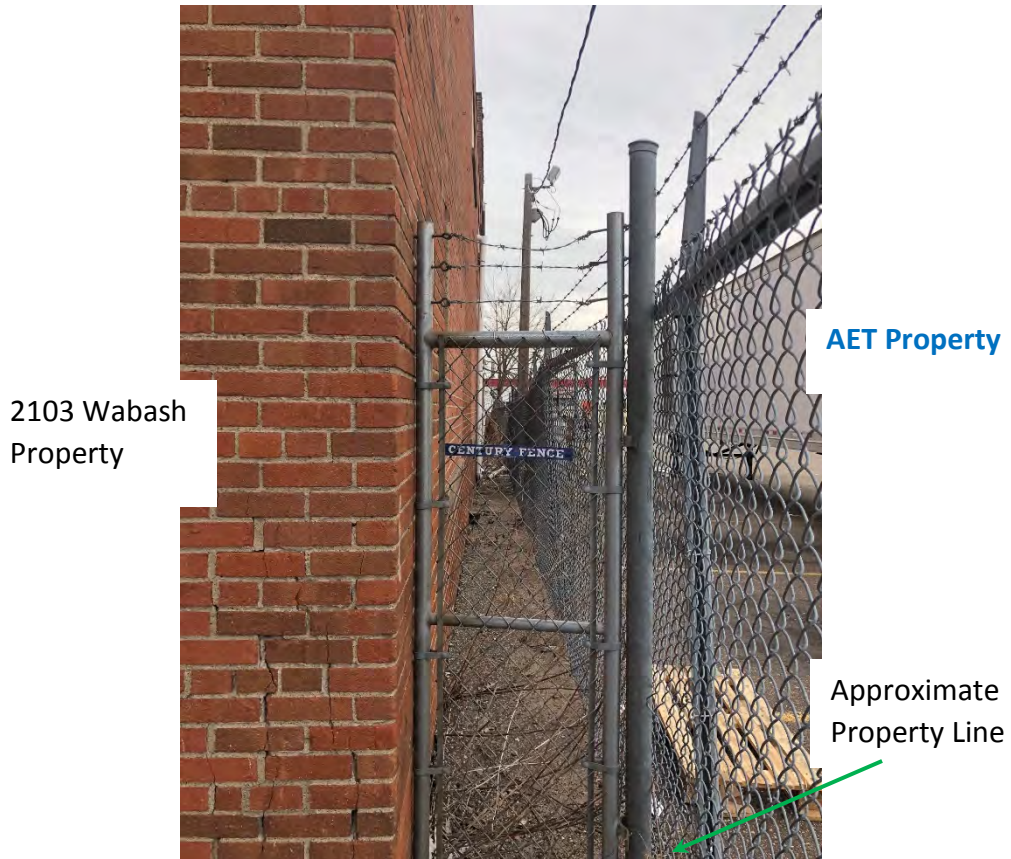
Application for Appeal - Conditional Use Permit

File Name: 2103 Wabash

File Number: 18-024-155

2103 Wabash Ave., St. Paul, MN

Date: 03/04/2018



Building A

Stronger Midway

President's Circle

Envision Catering & Hospitality

Hiway Federal Credit Union

Mille Lacs Corporate Ventures

Sunrise Banks

UPS

Warners' Stellan

Wellington Management

Western Bank

Xcel Energy

Director's Circle

American Engineering Testing, Inc.

Anchor Bank

Colliers

Hamline University

Hubbard Broadcasting, Inc.

Intermix Beverages

Loucks

McDonald's

Riverland Bank

Royal Credit Union

Seven Corners Printing

Saint Paul Port Authority

Thrivent Financial

Associate's Circle

Ally People Solutions

Associated Bank

Bywater Business Solutions

Clever Architecture

Episcopal Homes

FastSigns- Roseville

Ideal Printers, Inc.

Mahoney Ulbrich Christiansen & Russ, P.A.

Mendoza Law, LLC

Mortenson Construction

St. Paul Saints Baseball Club



March 26, 2018

Saint Paul City Council President Amy Brendmoen
310 City Hall
15 West Kellogg Boulevard
Saint Paul, MN 55102

Members of the Saint Paul City Council,

On January 19, 2018, the Midway Chamber of Commerce sent a letter of support for the redevelopment of 2103 Wabash Avenue based on the information available to us at that time.

Due to new information, the Midway Chamber of Commerce is rescinding its letter of support for the proposed 2103 Wabash Avenue project and is taking a neutral position. The Midway Chamber of Commerce continues to support efforts to attract and grow living wage jobs and increase the tax base in the Midway.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chad Kulas".

Chad Kulas
Executive Director
Midway Chamber of Commerce

CC: Members of Saint Paul City Council

Spruce Tree Centre • Suite #301 • 1600 University Avenue West • St. Paul, MN 55104
PHONE: (651) 646-2636 WEBSITE: www.midwaychamber.com



APPLICATION FOR APPEAL
 Department of Planning and Economic Development
 Zoning Section
 1400 City Hall Annex
 25 West Fourth Street
 Saint Paul, MN 55102-1634
 (651) 266-6589

Zoning Office Use Only
 File #: _____
 Fee: _____
 Tentative Hearing Date:
4-4-18

APPELLANT

Name American Consulting Services, Inc.
dba American Engineering Testing, Inc. Email dlarson@amengtest.com
 Address 550 Cleveland Ave. N.
 City St. Paul St. MN Zip 55114 Daytime Phone 651-659-1337

PROPERTY LOCATION

Zoning File Name 2103 Wabash
 Address / Location 2103 Wabash Ave., St. Paul

TYPE OF APPEAL: Application is hereby made for an appeal to the:

Planning Commission, under provision of Chapter 61, Section 701, Paragraph c of the Zoning Code, of a decision made by the Planning Administrator or Zoning Administrator

OR

City Council, under provision of Chapter 61, Section 702, Paragraph a of the Zoning Code, of a decision made by the Planning Commission

Date of decision: February, 23, 2018 File Number: 18-024-155

GROUND FORS FOR APPEAL: Explain why you feel there has been an error in any requirement, permit, decision or refusal made by an administrative official, or an error in fact, procedure or finding made by the Planning Commission.

Attachment A (Area Map) shows the location of AET's business in relation to 2103 Wabash Ave. AET purchased the 2108 University Ave. and 567 Cleveland Ave. parcels to expand our operations and grow our business in the Midway Area of St. Paul instead of moving and/or relocating operations out of St. Paul. The 2103 Wabash building directly abuts the property line of 567 Cleveland (which is zoned I2) and lies south of 2108 University Ave. (zoned I1) across Myrtle Ave. and an active railroad track. The Zoning Committee and Planning Commission may have been unaware of AET's planned development of AET's properties when reviewing the application for the Conditional Use Permit. AET's grounds for appeal are summarized on the attached pages.

Attach additional sheets if necessary

CK8005497

Appellant's Signature

Date

3/5/18

City Agent

add 3/5/18

Dan Larson, CEO and Chairman of the Board, American Consulting Services, Inc. Rev 9/4/14

GROUNDS FOR APPEAL (additional sheets)

FILE NAME: 2103 Wabash

FILE # 18-024-155

DATE OF DECISION: February 23,

TYPE OF APPLICATION: Conditional Use Permit

LOCATION: 2103 Wabash Avenue

We are generally supportive of new developments in our neighborhood, however, the 2103 Wabash development as currently proposed will infringe on and impede AET's ability to expand, grow our business, and redevelop our 567 Cleveland Ave. and 2108 University Ave properties.

American Engineering Testing, Inc. (AET) is a professional geotechnical, environmental, materials and forensics engineering consulting and accredited testing company. AET's corporate headquarters has been located at Cleveland and University Ave. in St. Paul's Midway district since 1990. The founders of AET specifically chose the Midway district for AET's headquarters because of the location and industrial zoning. In the past 10 years, we have grown by 100 jobs and we plan to continue this growth. At our St. Paul Campus, we have 250 engineers, scientists, technicians and staff with a total workforce of over 400 employee-owners located at our 20 offices throughout the United States.

Because AET is committed to remaining in St. Paul and the Midway area, we purchased the Rihm properties at 567 Cleveland and 2108 University in April 2017 to expand our operations instead of relocating our operations out of St. Paul. We have recently completed a building expansion on our 550 Cleveland site and have been working with the City of St. Paul Planning Department since 2015 on a long-term plan for the site. We have had several discussions about our plans for 567 Cleveland Ave. and 2108 University Ave. over the past year. We are planning to redevelop and relocate our field and drilling services department to 567 Cleveland Ave. with offices and additional services at 2108 University Ave. This includes tractor trailers, drill rigs and other heavy equipment that will be operated outside and inside of buildings; equipment and trucks will be moving through and around 567 Cleveland Ave. and the surrounding industrial neighborhood.

Zoning Code § 61.501 (d).

The conditional use permit was approved for a mixed residential/commercial use with more than six (6) dwelling units (64 proposed), with modification of a special condition for this use to allow dwelling units on the first floor (39 dwelling units proposed, no first-floor dwelling units permitted), and modification of the condition for this use that at least 80% of the first floor shall be devoted to non-residential principal uses (10% proposed). This development will impede AET's normal and orderly use, development and improvement of our property at 567 Cleveland Ave. N. for the I2 general industrial zoning district. At 567 Cleveland Ave., AET will be operating its drilling services business under the I2 zoning designation. The site will be used to operate, maintain and service drill rigs, heavy equipment, tractor trailers and other trucks. Equipment will flow through the site from morning into the evening. The introduction of apartments, especially apartments directly located on or within several feet of the east property boundary as shown in the permit application, is akin to people moving next door to airports and then being unhappy with the noise, odors, and industrial operations. Residents occupying first floor apartments will be living within a few feet of our operations. We are very concerned that our normal operations will result in resident complaints and lead to challenges to our further development.

Zoning Code § 63.207

Zoning Code § 63.207 requires a minimum of 1 parking space per studio or 1-bedroom apartment unit and 1.5 spaces per 2- or 3-bedroom dwelling unit. Retail uses would require 1 parking space per 400 square feet. No variance of parking requirements was requested. Based on the number of apartments (64) and number of bedrooms as shown in the application, plus the approximately 20,000 square feet of commercial space, approximately 120 parking spaces are required. The permit application shows 65 parking spaces; 55 parking spaces short of the required number of spaces. Tennant and business parking will be pushed into the neighboring properties. The permit application does not address this issue given the very limited on-street parking in this industrial area (see Attachment A).

Zoning Code § 61.501 (a):

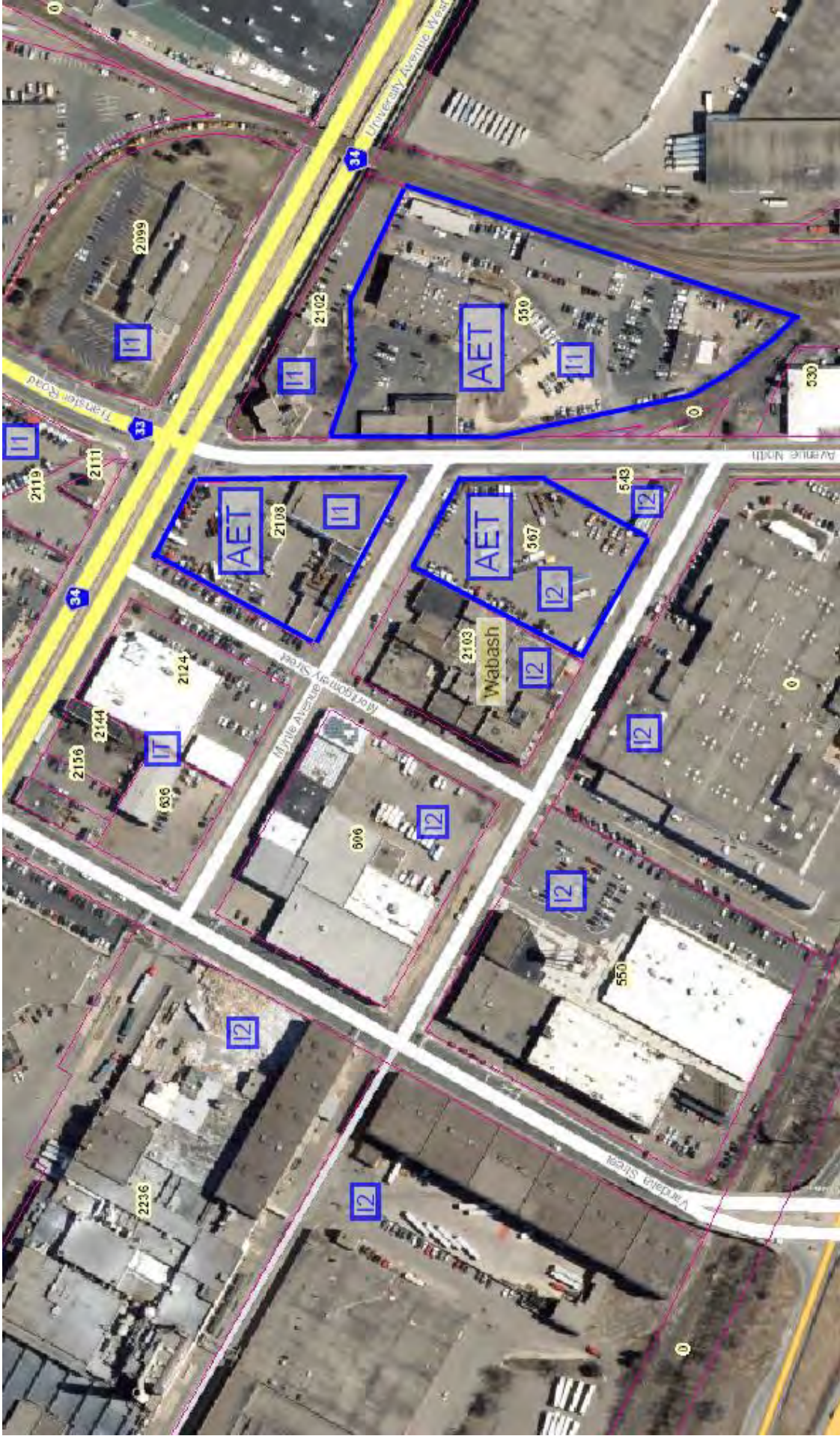
The proposed introduction of the large number of apartments at this location is contrary to St. Paul's Comprehensive Plan's Industrial designation. AET was fortunate to be able to purchase the Rihm property across the street from our corporate headquarters so we could remain in St. Paul and expand our operations. We added 3.4 acres of industrial property to our current 4.77 acres located on the east side of Cleveland Ave. If completed as proposed, conflicts between the residents at 2103 Wabash and industrial property owners surrounding the 2102 Wabash property, which includes AET, will arise. The West Midway Industrial Area Plan (WMIAP) says in Strategy PI-1 that the City should, "retain and protect current industrial land from conversions to non-industrial uses." The WMIAP also places great importance on improving buffering between existing "vulnerable land use edges" between residential and industrial uses to reduce conflicts and preserve industrial viability.

Zoning Code § 61.501 (c):

Streets adjacent to 2103 Wabash convey large amounts of truck traffic and do not have sidewalks. An active railroad track also runs along the north side of the property and a railroad track runs along the south side of the property. Traffic cuts through the neighborhood streets to and from University Ave. to Cleveland Ave. to avoid the stop light at the intersection of Cleveland Ave. and University Ave. To place apartments in the middle of an industrial area without sidewalks, with heavy truck traffic, and an active railroad track would endanger public safety.

Zoning Code § 61.502:

The Planning Commission's approval of the special conditions in the conditional use permit for this property is not consistent with "reasonable enjoyment of adjacent property" and AET's future industrial viability.



Scale:

Attachment A

Site Map – American Engineering Testing, Inc.

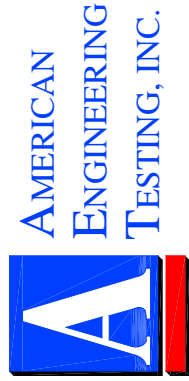
Application for Appeal - Conditional Use Permit

File Name: 2103 Wabash

File Number: 18-024-155

2103 Wabash Ave., St. Paul, MN

Date: 03/04/2018



ZONING COMMITTEE STAFF REPORT

FILE NAME: 2103 Wabash

FILE # 18-024-155

APPLICANT: Superior LLC

HEARING DATE: February 15, 2018

TYPE OF APPLICATION: Conditional Use Permit

LOCATION: 2103 Wabash Avenue, NE corner at Montgomery Street

PIN & LEGAL DESCRIPTION: 32.29.23.14.0002; Hewitt's Out Lots, Lots 118 - 119, and vacated adjacent 7 feet of Wabash Avenue, and vacated adjacent 10 feet of Montgomery Street

PLANNING DISTRICT: 12

PRESENT ZONING: I2

ZONING CODE REFERENCE: § 61.501, § 61.502, § 65.143(b)

STAFF REPORT DATE: February 8, 2018

BY: Bill Dermody

DATE RECEIVED: January 25, 2018

60-DAY DEADLINE FOR ACTION: March 26, 2018

- A. **PURPOSE:** Conditional use permit for a mixed residential/commercial use with more than six (6) dwelling units (64 proposed), with modification of a special condition for this use to allow dwelling units on the first floor (39 dwelling units proposed, no first floor dwelling units permitted), and modification of the condition for this use that at least 80% of the first floor shall be devoted to non-residential principal uses (10% proposed).
- B. **PARCEL SIZE:** 1.6 acres
- C. **EXISTING LAND USE:** Commercial/vacant building
- D. **SURROUNDING LAND USE:**
North: Commercial (I1, IT) (truck sales, cleaning services)
East: Parking lot and service station (I2)
South: Industrial (I2) (warehouse)
West: Industrial (I2) (self-storage, brewery, multi-tenant industrial)
- E. **ZONING CODE CITATION:** § 61.501 lists general conditions that must be met by all conditional uses. § 61.502 authorizes the planning commission to modify any or all special conditions after making specified findings. § 65.143(b) requires, for mixed residential and commercial use in an I2 general industrial zoning district, that dwelling units shall not be located on the first floor, that at least 80% of the first floor shall be devoted to non-residential principal uses, and that a conditional use permit is required for more than six (6) dwelling units.
- F. **PARKING:** Zoning Code § 63.207 requires a minimum of 1 parking space per studio or 1-bedroom apartment unit and 1.5 spaces per 2- or 3-bedroom dwelling unit. Retail uses would require 1 parking space per 400 square feet. No variance of parking requirements is requested.
- G. **HISTORY/DISCUSSION:** Prior to 1975 the site and the larger surrounding area between I-94 and the BNSF railway to the north was zoned heavy industrial with a strip of light industrial along University Avenue. When the City adopted a new zoning code in 1975 this area was zoned I2 general industrial with a strip of I1 light industrial along University Avenue. In 2011, as part of the Central Corridor (Green Line) zoning study, parcels north of the subject site along University Avenue were rezoned to IT transitional industrial.
- H. **DISTRICT COUNCIL RECOMMENDATION:** As of this writing, the District 12 Council has not provided a recommendation.

I. **FINDINGS:**

1. The site contains a mostly vacant former industrial building (fully vacant 2nd and 3rd floors, partially vacant 1st floor) that has reportedly not been fully used since 1979. Several retail/service businesses have partially occupied the 1st floor in recent years, including pet boarding, industrial tires sales and service, and guitar repair. The building was constructed in several stages of additions, resulting in multiple floor levels and roof levels.
2. The site is surrounded by industrial zoning and mainly industrial uses. It abuts Myrtle Avenue, Montgomery Street, and Wabash Avenue. The surrounding streets accommodate much truck traffic and do not have sidewalks.
3. Zoning Code § 65.143(b) includes the following special conditions that apply to mixed residential and commercial use in an I2 general industrial zoning district. *In I1-I2 industrial districts, dwelling units shall not be located in the basement or first floor and at least eighty (80) percent of the first floor shall be devoted to principal uses permitted in the district, other than residential uses. In the I2 district, a conditional use permit is required for a mixed residential and commercial use with more than six (6) dwelling units.* The application for a conditional use permit proposes 64 dwelling units in the building, including 39 first-floor units comprising up to 90 percent of the first floor area. Therefore, the conditions that there be no dwelling units on the first floor and that at least 80% of the first floor shall be devoted to non-residential principal uses are not met. The application requests that these conditions be modified as discussed below.
4. Zoning Code § 61.501 lists five standards that all conditional uses must satisfy:
 - (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.* This condition is not met. The site is designated in Comprehensive Plan Figure LU-B as Industrial, which calls for "(p)rimary manufacturing and/or the processing of products; could include light or heavy industrial land uses, large warehouse facilities, and/or utilities." The 2007 Central Corridor Development Strategy identifies the site as being outside the Areas of Change adjacent to the Green Line LRT. The West Midway Industrial Area Plan (WMIAP) says in Strategy PI-1 that we should, "(r)etain and protect current industrial land from conversions to non-industrial uses." The WMIAP also places great importance on improving buffering between existing "vulnerable land use edges" between residential and industrial uses so as to reduce conflicts and preserve industrial viability. The proposed introduction of apartments at this location is contrary to the Comprehensive Plan's Industrial designation and creates a new vulnerable land use edge in the heart of an industrial area that will put surrounding industrial uses at risk.
 - (b) *The use will provide adequate ingress and egress to minimize traffic congestion in the public streets.* This condition is met. The site has direct access to three 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.* This condition is not met. Adjacent streets do not have sidewalks and convey large amounts of truck traffic. To place apartments in the middle of an industrial area without sidewalks and with heavy truck traffic would endanger public safety.
 - (d) *The use will not impede the normal and orderly development and improvement of the surrounding property for uses permitted in the district.* This condition is not met. The introduction of apartments in the heart of an industrial area will impede the development and improvement of surrounding property for industrial uses permitted in the I2 general industrial zoning district.

(e) *The use shall, in all other respects, conform to the applicable regulations of the district in which it is located.* This condition is not met. The applicant has requested modification of regulations that apply to the proposed use in the I2 general industrial zoning district. The requirements for approval of the requested modification are discussed in Finding 5 below.

5. Zoning Code § 61.502 provides that *“the planning commission ... may modify any or all special conditions when strict application of such special conditions would unreasonably limit or prevent otherwise lawful use of a piece of property or an existing structure and would result in exceptional undue hardship to the owner of such property or structure; provided, that such modification will not impair the intent and purpose of such special condition and is consistent with health, morals and general welfare of the community and is consistent with reasonable enjoyment of adjacent property.”* These requirements for modification of special conditions are not met. The application requests modification of conditions that prohibit dwelling units on the first floor and require that 80% of the first floor be devoted to principal uses permitted in the district, other than residential uses. Though the strict application of these conditions would likely prevent otherwise lawful use of this long-underutilized building due to its condition and the investment that would be required to make it functional for industrial uses, the requested modification to allow 39 dwelling units on the first floor and decrease the required amount of non-residential use on the first floor from 80% to 10% would impair the intent and purpose of these conditions to retain and protect industrial land in the I2 general industrial district from conversion to residential uses, to reduce conflicts between residential and industrial uses, and to preserve industrial viability. Also, the modification would be detrimental to public safety and reasonable enjoyment of adjacent property by locating a large number of residential units in the middle of an industrial area, as discussed in Findings 4(a), 4(c), and 4(d).

J. **STAFF RECOMMENDATION:** Based on the above findings, staff recommends denial of the application for a conditional use permit for a mixed residential/commercial use with more than six (6) dwelling units (64 proposed), with modification of a special condition for this use to allow dwelling units on the first floor (39 dwelling units proposed, no first floor dwelling units permitted), and modification of the condition for this use that at least 80% of the first floor shall be devoted to non-residential principal uses (10% proposed), at 2103 Wabash Avenue.

Attachments:

1. Application materials
2. Correspondence received
3. Staff photos
4. Sidewalks map
5. Aerial/land use/zoning maps



CONDITIONAL USE PERMIT APPLICATION

Department of Planning and Economic Development
Zoning Section
1400 City Hall Annex
25 West Fourth Street
Saint Paul, MN 55102-1634
(651) 266-6589

PD 12

Zoning	18-024155
File #	315
Fee	315
Preliminary Hearing Date	2-15-18

APPLICANT

Name MC Superior LLC
 Address 275 E. 4th St # 720
 City St. Paul St. MN Zip 55101 Daytime Phone 612 805 2306
 Name of Owner (if different) _____
 Contact Person (if different) Allissa Grig Phone 612 805 2306

PROPERTY LOCATION

Address / Location 8103 Washington Avenue, St. Paul, MN 55101
 Legal Description PID 32.291.23.14.0002
See attached Current Zoning I2
 (attach additional sheet if necessary)

TYPE OF PERMIT: Application is hereby made for a Conditional Use Permit under provisions of Chapter 65, Section 143, Paragraph b of the Zoning Code.

SUPPORTING INFORMATION: Explain how the use will meet all of the applicable standards and conditions. If you are requesting modification of any special conditions or standards for a conditional use, explain why the modification is needed and how it meets the requirements for modification of special conditions in Section 61.502 of the Zoning Code. Attach additional sheets if necessary.

Requesting a Conditional Use Permit for a mixed commercial / residential use as allowed in 65.143b. Requesting modifications to the requirements of 65.143b from 80% commercial / 20% residential on the first floor to 10% commercial / 90% residential on the first floor. Commercial space will be located on the west side of the building adjacent to Montgomery St. accessible from the building entrance and lobby.

See Attached Exhibit B dated 1/25/18

Required site plan is attached

EK1013
315⁰⁰

Applicant's Signature [Signature] Date 1/23/18 City Agent [Signature]
 1-25-18

CWP

EXHIBIT "A"

**Lot 118, Hewitt's Out Lots 1st & 2nd Division
Lot 119, Hewitt's Out Lots 1st & 2nd Division**

and

That part of the Southeasterly 10 feet of Montgomery Street, formerly Havana Street, vacated, lying between the Northwesterly extension across said street of the Northeasterly and Southwesterly lines of Lot 118, Hewitt Out Lots First & Second Division, according to the recorded plat thereof, Ramsey County, Minnesota.

Being Registered land as is evidenced by Certificate of Title No. 364874.

Exhibit C

2103 Wabash

Date 1/25/18

Revised 2/1/18

Response to Sec. 61.501. - Conditional use permit, general standards. (Para a through e)

Requirement:

- (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.

Response: The extent of the proposed redevelopment is consistent with the character of the existing building. The proposed uses will not increase the intensity of use beyond what is typical of the surrounding area. The commercial / "marker" spaces will also support the retention of jobs in the neighborhood which is consistent with the Comprehensive Plan.

- (b)** The use will provide adequate ingress and egress to minimize traffic congestion in the public streets.

Response: Site circulation will allow for proper ingress and egress to the surrounding streets. Parking will be clearly marked and allow efficient ingress and egress. The property will not generate traffic rates beyond the capacity of the existing 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.

Response: The proposed uses will maintain the existing structure to the greatest extent possible preserving its place in the fabric of the neighborhood. The exterior of the building will be appropriately renovated in a manner consistent with the buildings existing character. The nature and character of the redevelopment will not endanger the public health, safety, and general welfare.

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

Response: The proposed project will not prevent orderly development of the adjacent properties or neighborhood. The development will not change the current character of the neighborhood. The mix of commercial and residential spaces will allow the building to remain an important part of the fabric in the neighborhood and support the goals of the Enterprise Zone.

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

Response: The use will conform to the applicable regulations of the district as revised by the CUP.

Attachments: Exhibit E – Lower and First Level Plan

Exhibit F – Creative Enterprise Zone Map – w/ project location

Exhibit D

2103 Wabash

Date 2/1/18

Response to Sec. 61.502. – Modify Special Conditions.

Requirement:

The planning commission, after public hearing, may modify any or all special conditions, when strict application of such special conditions would unreasonably limit or prevent otherwise lawful use of a piece of property or an existing structure and would result in exceptional undue hardship to the owner of such property or structure; provided, that such modification will not impair the intent and purpose of such special condition and is consistent with health, morals and general welfare of the community and is consistent with reasonable enjoyment of adjacent property.

Response:

The strict application of the mixed use 50% commercial / 50% residential ratio for the first floor as currently defined in Section 65.143(a) will adversely affect the financial viability of the project. The commercial spaces generate significantly lower income per square foot than residential. This reduction of income will not allow the project to work economically.

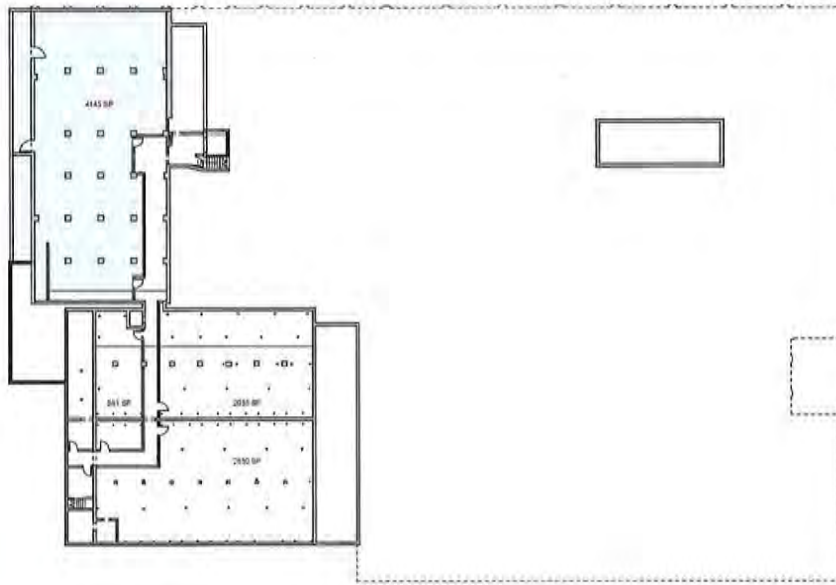
Reducing the 50% commercial / 50% residential ratio for the first floor to 10% commercial / 90% residential will minimize the balance the economic impact on the project pro forma. Creating 10% commercial space using “maker” spaces will help balance the projects revenue generation between the two uses and retain jobs in the area.

The “maker” spaces will be consistent with the industrial nature of the neighborhood. These spaces will hold jobs within the neighborhood. They will be places that work still happens. The flexible nature of the spaces will accommodate a wide array of commercial / “maker” activities. These activities will be consistent with the nature of the neighborhood and appropriate for an Industrial Zone. The activities will not adversely affect the neighboring properties. The creative nature of the commercial / “maker” spaces will support the Enterprise Zone.

Attachments: Exhibit E – Lower and First Level Plan

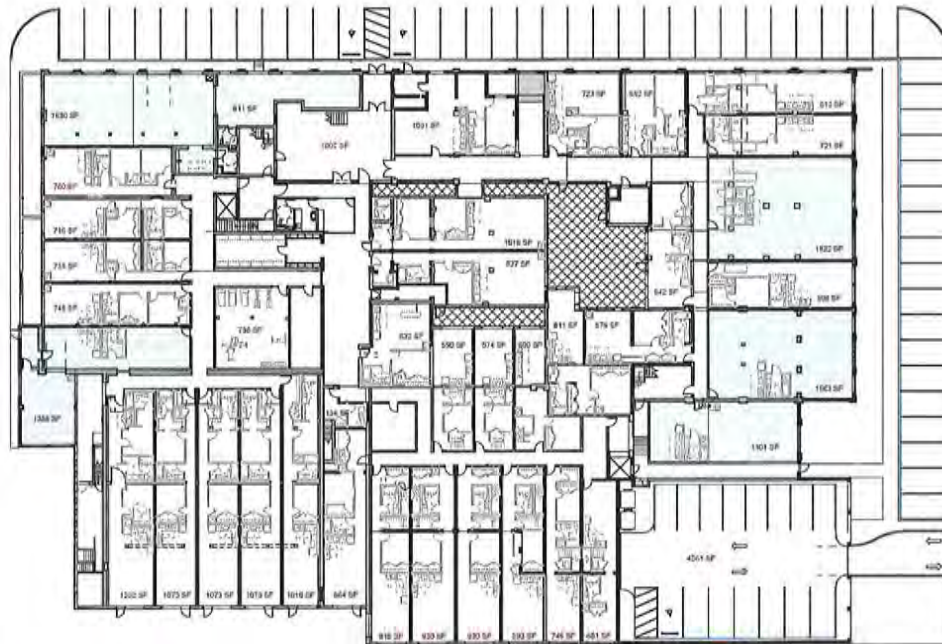
Exhibit F – Creative Enterprise Zone Map – w/ project location

EXHIBIT E



☐ COMMERCIAL SPACE

SUBLEVEL



☐ COMMERCIAL SPACE

LEVEL 1

EXHIBIT F

CREATIVE ENTERPRISE ZONE





January 19, 2018

Rich Pakonen
Clint Blaiser
PAK Properties / HBG Group
275 4th Street East, Suite 720
St Paul, MN 55101

Dear Rich and Clint,

Thank you for your time to share information about your Wabash Avenue redevelopment project with our organization. It is exciting to see new ideas, energy, and investment happening in the Midway. We believe your work to redevelop the closed meat packing plant at 2103 Wabash Avenue will bring the site back to life, connect with the community, and support other future development projects.

On behalf of the Midway Chamber of Commerce, we are pleased to inform you that our Board of Directors has passed a resolution supporting your project and your efforts to secure a change in the property's zoning from I2 – General Industrial District to IT Industrial Transitional. We also support your effort to seek a Conditional Use Permit to accommodate the residential uses that are part of the plan.

We believe your proposed plan would actively contribute to the momentum from Vandalia Tower, Lake Monster Brewing, and the new facilities for American Engineering and Testing. Your work on other recent St. Paul developments that include the Osborn 370 and Pioneer Endicott buildings demonstrate your team's ability to create successful projects and impact.

The Midway Chamber has been an important voice to bring the community together in our area and we believe your project will help build on the momentum we are seeing throughout the area. We wish you luck as your project moves forward and are proud to be able to add our support.

Sincerely,

Midway Chamber of Commerce Board of Directors



Saint Paul
PORT AUTHORITY

January 16, 2018

Rich Pakonen
Clint Blaiser
PAK Properties / HBG Group
275 4th Street East, Suite 720
St Paul, MN 55101

RE: Zoning Change and Conditional Use Permit for 2103 Wabash Avenue

Dear Rich and Clint,

Thank you for the recent opportunity to learn more about your proposed redevelopment of the closed meat packing facility that is located at 2103 Wabash Avenue. We appreciate your work on this project and are excited to see new ideas, energy, and investment happening in St. Paul. We believe your plans to redevelop the building will bring the site back to life and connect it with other surrounding properties.

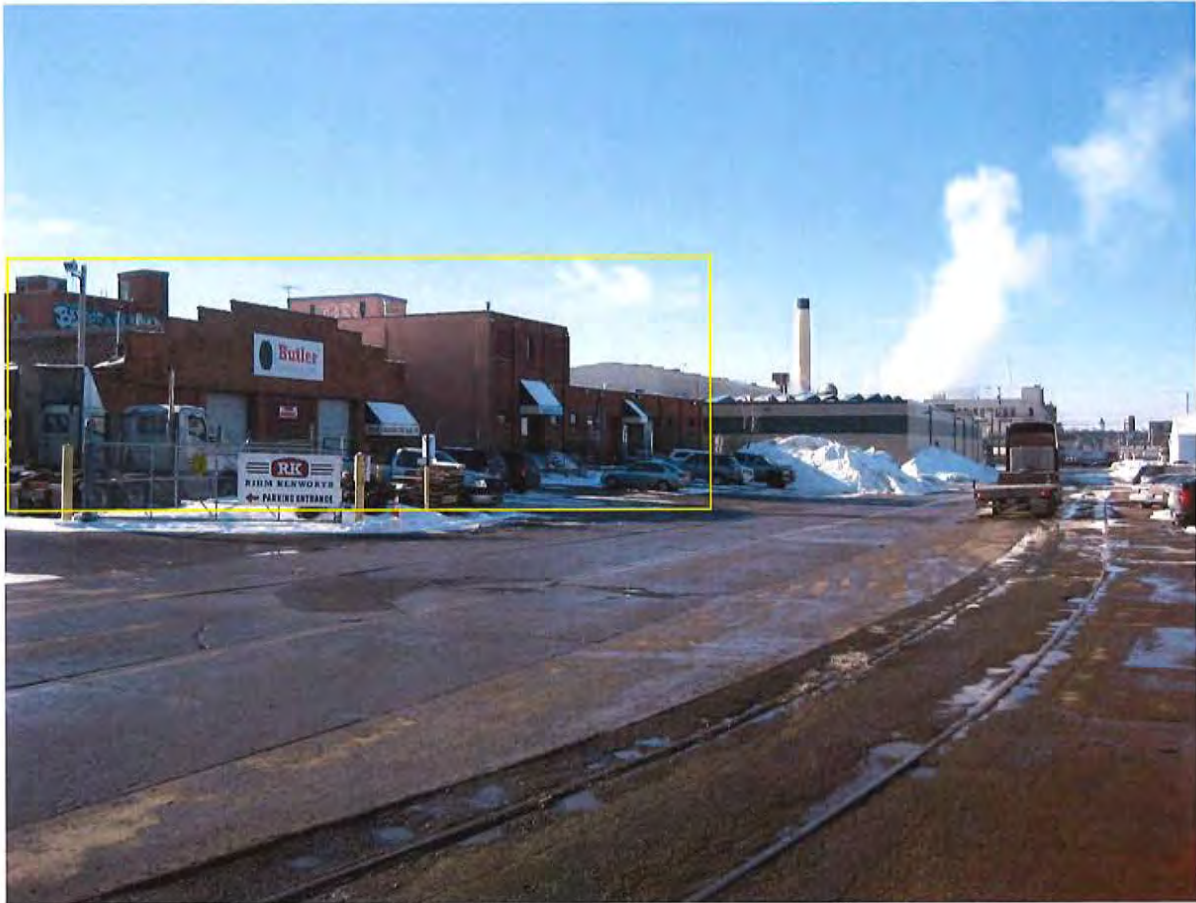
As you know, one of the Port Authority's strategic goals is to preserve industrially zoned land. We are excited that this project will return to the site to an active use and protect its industrial zoning. Please consider this letter as our organization's formal support for your project and your efforts to secure a change in the property's zoning from I2 – General Industrial District to IT Industrial Transitional. We also support your effort to seek a Conditional Use Permit to accommodate some of the uses that are part of the plan.

The Port Authority has supported projects that redevelop and re-invest in complex sites in St. Paul that will create new tax base that is important to the broader community. Your proposed mixed-use project will accomplish this by finding a way to bring back to this valuable piece of historic property back to life after decades of limited or little use.

This is a time of positive change in the Midway area and we believe your project will help St. Paul and this part of the community build on the momentum we are seeing throughout the area. We wish you luck as your project moves forward and are proud to be able to add our support.

Sincerely,

Lee Krueger
President, CEO
Saint Paul Port Authority



Looking west along Myrtle, subject site in yellow outline



Looking north/northeast along Montgomery, subject site is the entire building and parking on right



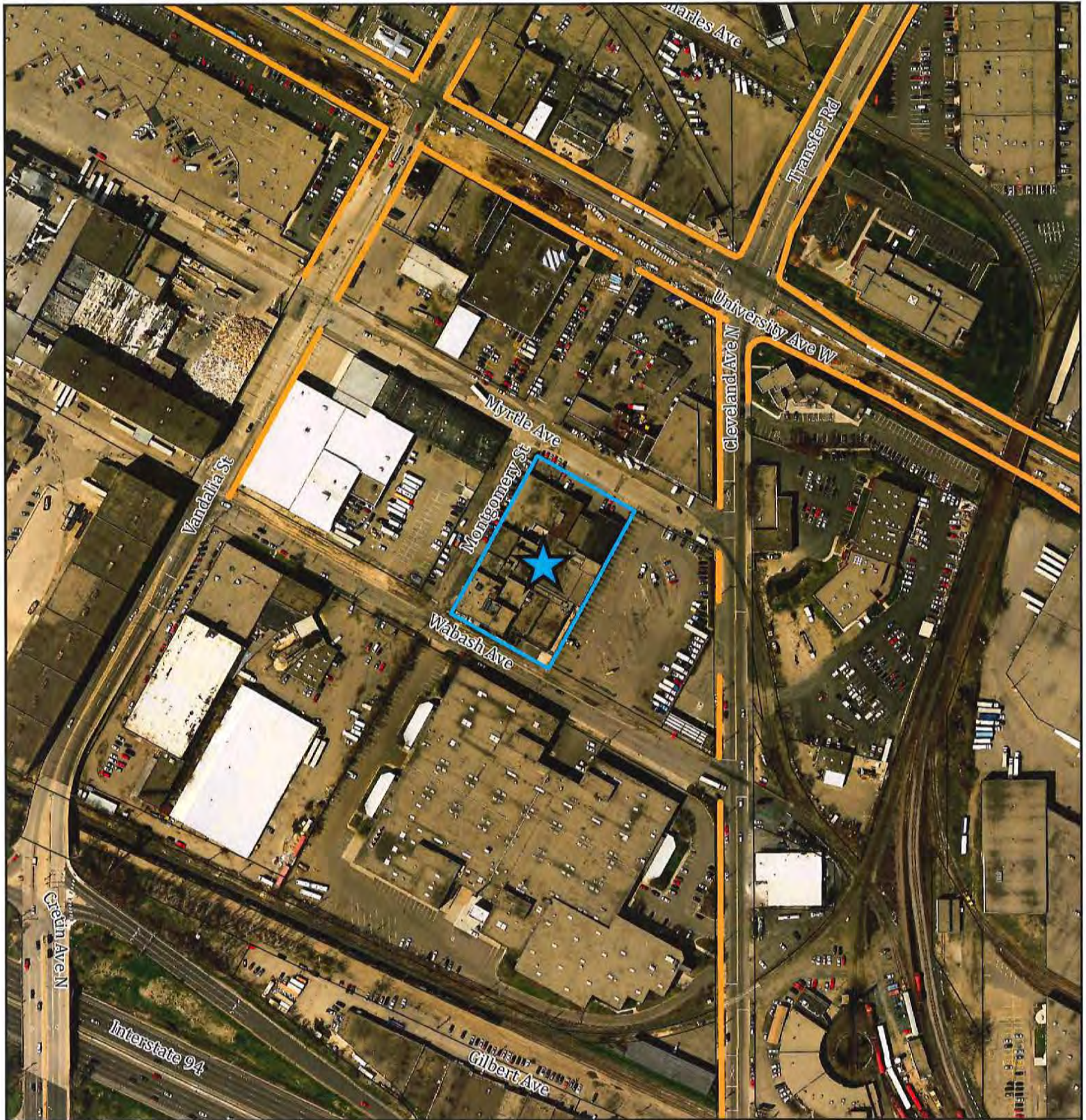
Looking east along Wabash, subject site on the left



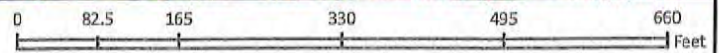
Looking west along Wabash, subject site on the right




Looking west/northwest along Wabash, subject site is the brick building in yellow outline



— Sidewalks



Aerial

 Subject Parcels

FILE NAME: 2103

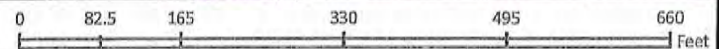
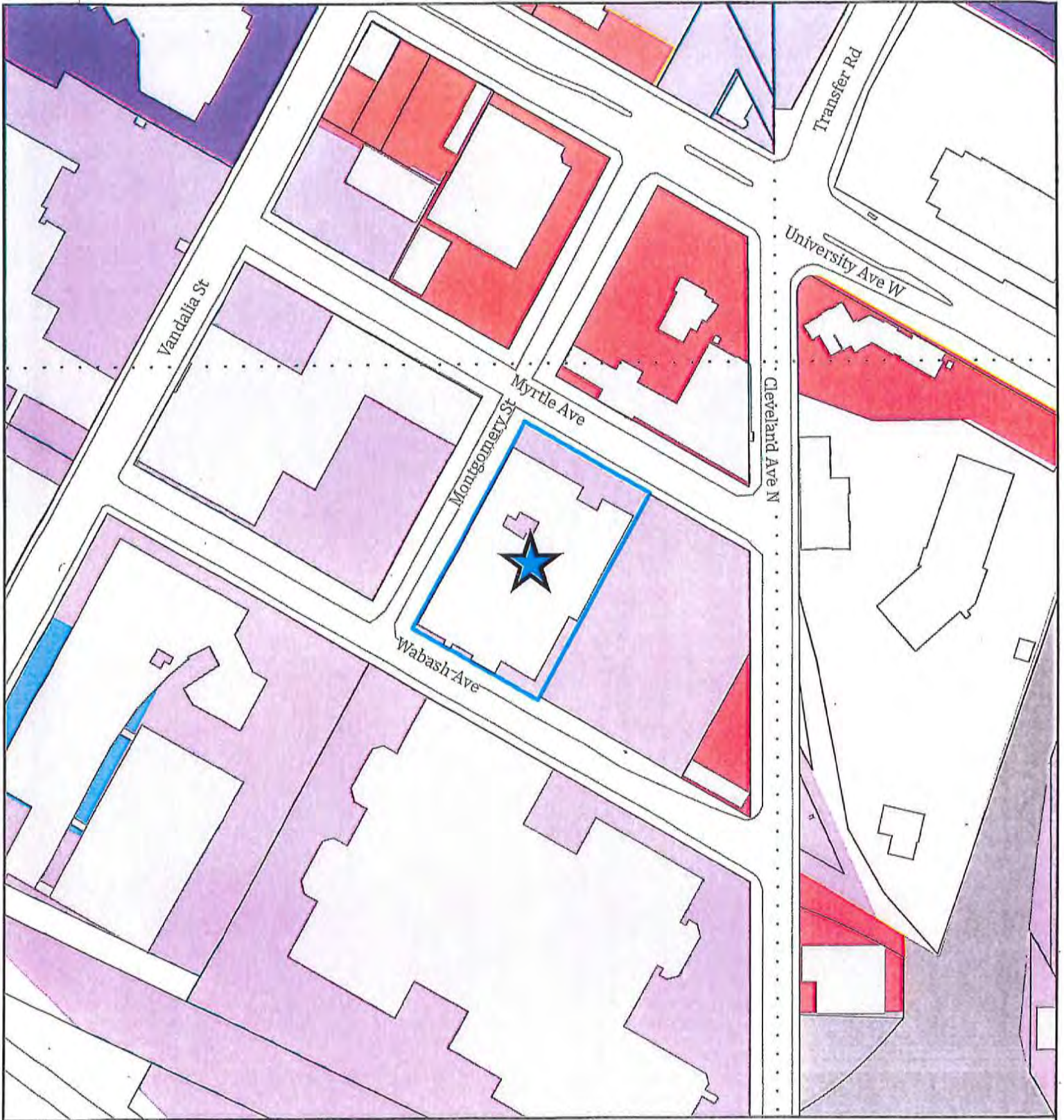
APPLICATION TYPE: CUP w/mod

FILE #: 18-024155 DATE: 1/30/2018

PLANNING DISTRICT: 12

ZONING PANEL: 7





FILE NAME: 2103

APPLICATION TYPE: CUP w/mod

FILE #: 18-024155 DATE: 1/30/2018

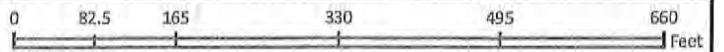
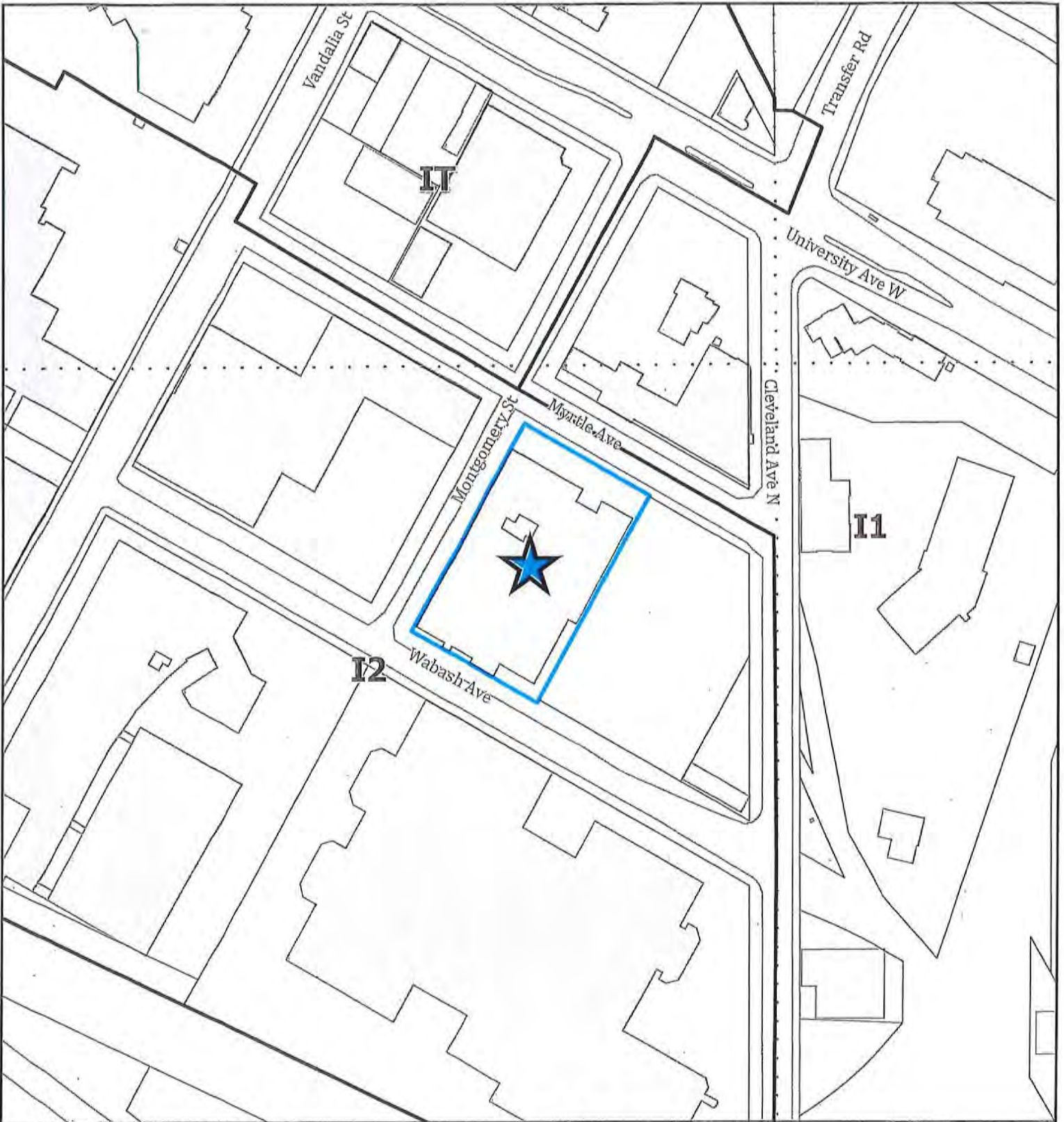
PLANNING DISTRICT: 12

ZONING PANEL: 7

Land Use

- Office
- Retail and Other Commercial
- Mixed Use Industrial
- Industrial and Utility
- Institutional
- Railway
- Subject Parcels
- Section Lines





FILE NAME: 2103


APPLICATION TYPE: CUP w/mod


FILE #: 18-024155 DATE: 1/30/2018

PLANNING DISTRICT: 12

ZONING PANEL: 7

Zoning

 Subject Parcels

 Section Lines

