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January 7, 2020

**By email and US Mail**

Zoning Committee of the St. Paul Planning Commission  
C/o Samantha Langer, Committee Secretary  
Planning and Economic Development  
25 W 4th Street, Suite 1400  
Saint Paul, MN 55102

**RE: Luther Seminary, South Campus, Site Plan 19-015088**

To Whom It May Concern:

I represent Luther Seminary, owner of the subject property above. The Seminary submitted a site plan for the property that was approved on November 26, 2019, which is now being appealed. On behalf of the Seminary, I request that the Zoning Committee deny the appeal and uphold the site plan approval without changes.

Luther Seminary has been a fixture in the St. Anthony Park neighborhood since 1900. We have tried to be good neighbors, allowing community members to use our grounds and facilities for activities ranging from dog walking to community gatherings to serving as the polling place for elections. We look forward to remaining a vital part of the neighborhood for decades to come.

We submitted the above-referenced site plan as part of a larger effort to restructure our campus. Theological education, like higher education in general, has undergone major changes in recent years. We no longer need as large a campus as we once did. Currently, the campus covers 26 acres with 282,000 square feet of building space. Our plan is to consolidate onto roughly 10 acres, with a little over 100,000 square feet of building. The remainder of the campus is being sold to be redeveloped into a range of housing options, including affordable housing, to help ease the housing shortage in St. Paul – as well as adding to the property tax base of the city.

The appeal centers on one small element in the site plan, a 19-space parking lot along Branston Street that replaces two existing garages and surrounding parking area which accommodates up to 12 cars total. A stormwater containment tank will sit beneath the lot, reducing run-off and improving water quality for the entire site. The parking lot is a permitted use within the Conditional Use Permit (CUP) covering the campus and conforms with setback and other requirements established by the City.

The neighbors submitting the appeal cite concerns about safety, due to the increased traffic on Branston street and the adjoining playground. Luther Seminary respectfully disagrees that the design will materially compromise safety. Parking will be restricted to use by Luther Seminary employees, students, and guests, most of whom will use the lot for all or most of the day. As a result, any increase in traffic will be modest, with much of it in the early morning when the playground is less used. Moreover, there is no reason to expect that the Seminary's employees, students and guests will be less attentive than other drivers on Branston Street, despite an implication of such in the appeal letter.

This matter has already been addressed by the Zoning Committee in its consideration of Luther Seminary's amended CUP application in March 2019 (Planning Commission file 19-11). The

Seminary submitted the CUP amendments to correct a drawing error from the 1980s and to position itself for the planned sale of its North Campus parcel. Our application included preliminary site plan drawings that showed the Branston Street parking lot largely as it was presented in the approved site plan, although we have reduced the lot from 21 to 19 spaces in the approved site plan.

The CUP and preliminary site plan were presented at a public meeting of the District 12 Land Use Committee on March 7, 2019; Branston Street residents raised concerns about the lot at that meeting, but the committee and the full St. Anthony Park Community Council (SAPCC) endorsed the proposal. The Zoning Committee held hearings on the CUP on March 14, 2019; again Branston Street residents raised their concerns, but the committee approved the CUP amendments.

The SAPCC endorsement letter included a caveat concerning efforts to limit traffic volume and speeds on Branston Street. Luther Seminary has taken steps to honor this request. Limiting access to Seminary employees, students, and guests encourages day-long use and hence lowers the number of trips on Branston Street. The City, not Luther Seminary, is responsible for other actions, such as additional street signs and speed limit changes. We support such actions, but it is not appropriate to condition approval of the site plan on such City actions. (Incidentally, the Planning Commission resolution approving the CUP amendments did not include any caveats similar to what was included in the SAPCC letter.)

Luther Seminary's position is that this is a settled matter and the site plan approval should be upheld without changes. The Branston Street parking lot is a permitted use under the CUP. We have designed the lot to comply with all city codes and requirements. City staff have reviewed the plans and agree that the lot complies with both city codes and the CUP.

In closing, I want to emphasize that Luther Seminary shares our neighbors' commitment to pedestrian safety, both on Branston Street and throughout the campus. We have incorporated broad sightlines and clear signage into our design. The plan for our campus entrance off Fulham Street, in particular, enhances safety and access for persons with disabilities.

I plan to attend the Zoning Committee appeal hearing on January 16, 2020. I look forward to answering any additional questions you have regarding our site plan at that time.

Best regards,



Michael Morrow  
Vice President, Finance and Administration

Cc: Tia Anderson, Senior City Planner  
Kathryn Murray, Executive Director, St Anthony Park Community Council  
Meri and Don Hauge