



Application for Appeal

Department of Planning + Economic Development
ZONING SECTION
1400 CITY HALL ANNEX
25 W 4th ST
Saint Paul, MN 55102-1034

(651) 260-6589

MR

Zoning office use only

File # _____

Fee _____

Tentative hearing date: _____

Appellant

Name Neighbors for Responsible Development
Address 275 S Warwick St
City St Paul St. MN Zip 55105 Daytime phone 651.230.1233
Name of owner (if different) U.C. Flanagan

Property Location

Address 246 252 258 Snelling Ave S.
Zoning file name 18-055 252 and
Legal description: PIN 1028 23220164-0165 0166
lots 1 through 5 Block 4 Sylvan Park Addition
(attach additional sheet if necessary)

Type of Appeal: Application is hereby made for an appeal to the:

- Planning Commission, under the provision of Chapter 61, Section 701, Paragraph C of the Zoning Code, of a decision made by the Planning Administrator or Zoning Administrator
- City Council, under the provision of Chapter 61, Section 702, Paragraph A of the Zoning Code, of a Decision made by the Planning Commission MAY 13, 2018. FILE # 18-055 252
- Board of Zoning Appeals (BZA), under the provisions of Chapter 61, Section 701, Paragraph C of the Zoning Code, to appeal a decision made by the BZA on _____ File Number _____
(date of decision)

MR

Grounds of 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, City Council, or BZA.

The Planning Commission's decision to approve the CUP for these properties is in error as the CUP requested does not meet the Conditions stipulated in § 61.501 parts C+D. (See accompanying letter for documentation + detail.)

Appellant's signature

U.C. Flanagan

Date

5/25/2018

City agent

pdd
5/25/18

DATE: May 25, 2018
TO: Members of the Saint Paul City Council
FROM: Neighbors for Responsible Development
cc: Tia Anderson – Public Record
RE: Proposed Snelling | Saint Clair Development
File #18-055-252

The Saint Paul Planning Commission voted on May 18 in favor of the LaValle Development's Conditional Use Permit request for 246-252-258 Snelling Avenue S.

This letter will serve as grounds for an appeal of that decision.

The Planning Commission on May 18 and the Zoning Committee on May 10 addressed and voted for the TjL LaValle Development planned for PIN 102823220164-0165-0166. They did not, however, discuss or vote on the general conditions that must be met by all conditional uses (§61.501) in order to approve or deny a Conditional Use Permit (CUP).

The process by which the Zoning Committee conducted the May 10 hearing was flawed from the start. The discussion focused on the merits of the project itself—not the CUP application at-hand. Because of this, **I feel strongly that a procedural error has occurred and that this hearing and subsequent vote by the Planning Commission is not valid.**

The CUP requested is equal to a full additional story on all three lots for which the CUP was requested.

Specifically, the CUP request does not meet §61.501(Standard C) which stipulates *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.*

The CUP requested for additional height is at least **3x the height of other buildings at this intersection and 5x the height of single family homes this property would overlook.**

- **Heights of 68'4 and 47' will impact the sunlight and privacy of adjacent single story neighborhood homes, immediately to the east. This will radically interfere with residents' quality of life.**
- **Construction of these properties at CUP heights proposed will result in additional floors and tenants adding to unsustainable traffic levels at the St. Clair | Snelling intersection. No traffic study has been done nor has one been proposed.**

- **Over 100 additional cars at this intersection will cause traffic congestion and result in parking issues on adjacent streets, limiting parking options for current homeowners and neighboring businesses.**
- **Pedestrian safety, increased exhaust and noise due to 118 new apartments on this corner are public health concerns no one has yet addressed.**

In addition, the proposed height requested through the CUP does not meet §61.501 (Standard D) which requires that *the use will not impede the normal and orderly development and improvement of the surrounding property for uses permitted in the district.*

- **The added height and massive design will be detrimental to the existing character of the immediate neighborhood and negatively affect property values.**
- **Young professionals have already sold their homes on the 200 block of Brimhall rather than have their backyards face the height of the development proposed.**

TJL/LaValle's CUP for additional height deserves further discussion with public testimony before this CUP is voted on by the full City Council.

Thank you for your consideration of this request to be (truly) heard.

Respectfully,



Margaret C. Flanagan
(Representing) Neighbors for Responsible Development
275 S Warwick
Saint Paul, MN 55105