



July 7, 2017

Board of Zoning Appeals | Department of Safety and Inspections  
375 Jackson Street, Suite 220  
Saint Paul, MN 55101-1806

RE: Application for a zoning variance at 17 Hall Lane (File 17-040587)

To BZA members,

The West Side Community Organization (WSCO), the neighborhood planning Council for District 3, holds a standing resident-led Land Use committee meeting each month to, among other business, make recommendations on major variance applications within the District. At its most recent meeting on June 20<sup>th</sup>, 2017, WSCO's Riverfront Development and Land Use committee voted to oppose the variance requested for 17 Hall Lane (File 17-040587) based on two major concerns:

1. **Does the bluff have the capacity to support new residential development (and the excavation, tree removal involved) without compromising stability and integrity?** Although the proposed structure does meet the bluff setback requirements as configured, this is a minimal and crude assessment of how new development may negatively impact the bluff. No soil boring and sampling findings were included in the application, nor was a geotechnical engineering study done.

In December 2016, the Minnesota Department of Natural Resources adopted new rules for Mississippi River Corridor Critical Area (MRCCA), including development within Bluff Zones. They have not yet been adopted by the City of Saint Paul. If they had, however, more information and assessment would be required before this project could move forward. We point this out to underscore that bluff integrity and stability is of concern to not just West Siders but to a much broader coalition of state, regional, and local agencies. In other words, just because the city's current zoning code may allow it, that does not necessarily mean its safe or sustainable. There are businesses and sidewalks directly below this area on Wabasha Street; large boulders have been in the streets as recently as 2015. The concerns for public safety, for the protection for natural assets and environment, cannot be overstated and should take a back seat for one lot in the name of in-fill development.

2. **The site, as presented in the application, does not allow for adjacent off-street parking, which is standard among single family detached houses in this area.** Residents addressing the committee pointed out that while several homes do have a garage/home configuration like the one proposed (with a garage in front) nearly all have at least one additional stall so as not to obstruct the narrow street.

WSCO's Riverfront Development and Land Use Committee recommends the BZA deny this zoning variance request. However, if the committee is determined to bypass these pressing concerns voiced by the community, we strongly advise that a geotechnical engineering study of the potential impact to the bluff be required by the city before the variance is granted.

Sincerely,

WSCO Riverfront Development and Land Use Committee

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