

Paul M. & Kathryn L. Hirsch
909 Lexington Parkway South
Saint Paul, Minnesota 55116

July 9, 2018

St. Paul City Council
City of Saint Paul Planning & Economic Development
1400 City Hall Annex
25 West Fourth Street
Saint Paul, Minnesota 55102

Re: File # 18-059-091, Wedum Albion LLC Senior Housing

Dear Councilmembers,

We own the home located across the street from the proposed location for the parking structure for the development planned for the 900 Albion Ave. site. We are writing to express our concern about the development as currently proposed, and our opposition to changing the zoning for this site and granting a variance and conditional use permit.

Our house is our family's home and main asset. The changes to Lexington Parkway and the former Albion site that are underway will have a major impact on our lives, but we want to make clear that we are not in any way trying to stand in the way of progress. We are not opposed to development of the site generally, and we support projects to add needed affordable housing to an area where it is in short supply, especially for older community members. However, as proposed, this project will not advance the goals of the Saint Paul Comprehensive Plan. Making unnecessary tradeoffs to comply with the plans of one developer will burden all who live, work, and travel in our neighborhood and squander an opportunity to add affordable housing that meshes with the surrounding buildings and roadways.

The conclusions of the Zoning Committee Staff Report dated May 17, 2018 are based upon a change in zoning from R4 to T3 that is inappropriate and not required for this particular project. R4 specifically provides for residential care facilities. A change to T3 would be contrary to the goals of the Saint Paul Comprehensive Plan and the intent of the Zoning Code. The Comprehensive Plan calls for land use that promotes aesthetics and development standards for a pedestrian-scaled environment, while enhancing the public realm— goals that are not served by building an excessively tall building that will dramatically increase traffic in what has been a residential area near businesses and well-used pedestrian paths. Although there are some taller buildings closer to the river, there are no comparably tall structures along either Lexington or West 7th in this area.

The Staff Report acknowledges the requirements of the Zoning Code then concludes that these are met through unsupported assertions. Without explanation or detail, it states that the findings required for a variance under Sections 61.601(a) and (b) are met. Sec. 61.601(a) of the Zoning Code calls for a finding that a variance will be "in harmony with the general purposes and intent of the zoning code." The Staff Report states that this finding is met because the project will "reflect the scale, character, and urban design of St Paul's

existing traditional neighborhoods" and "provide housing choice and...affordability"— but does not explain how this is true. Likewise, with respect to Sec. 61.601(b) (that the variance is "consistent with the comprehensive plan"), the Report says that this finding is met because it will result in a "pedestrian-friendly street environment."

The Staff Report itself reveals that this will not be the case. In the section addressing the conditional use permit, the Report states that the first phase of the project alone will add approximately 165 residential units to a busy area bordered by primary thoroughfares, and that these units will be "market rate." The findings of the Report that there will not be a detrimental effect on the neighborhood are based on West 7th Street being "a mixed-use corridor and the selected route for a modern streetcar transit line, known as Riverview Corridor, which will create a new transit connection."

Under the most optimistic scenario, the proposed Riverview Corridor will not alleviate the traffic problems this project will create. The addition of significant transit capacity in the area is speculative, and at soonest still many years away. We share in the hope that a new transit line will be added in coming years, but it is by no means certain. As the Council is well aware, the potential Riverview Corridor is the subject of multiple areas of ongoing studies including engineering, environmental impact, and the possible need for a new bridge. The potential transit project involves serious challenges related to issues on MN 5 and transit links along the former Ford plant site. Even if all of the studies' findings are positive and solutions and funding are found that allow the transit project to go forward, the studies alone are projected to take several more years before the years of final design and construction can even begin. In the meantime, this project will add hundreds of residents and staff—and their vehicles—with no relief.

The developer, EDI, will benefit greatly from the planned redesign of Lexington Parkway, and if it does materialize, from a new transit line as well. A conditional use permit is meant to be granted in exchange for some concession to the community from the landowner who benefits, but no such concession is given under this proposal. According to Zoning Code Sec. 61.601(c), a variance from existing provisions requires a finding that the applicant "has established that there are practical difficulties in complying with the provision," and expressly instructs that "*[e]conomic considerations alone do not constitute practical difficulties.*" In this situation, the developer has chosen to build a facility with special requirements on an especially challenging site. It has failed to secure appropriate financing. These are strictly economic problems that EDI created for itself by choosing to build this type of facility on this site, and their expected costs and profits do not justify dramatic alterations to the character of the neighborhood.

We attended the Zoning Board meeting on May 24 and were extremely disappointed with the lack of consideration for any of these issues. While one member did raise the notion of affordable housing goals, this serious concern was shrugged off and dismissed in response to a reply from the developer's representative about their need to be profitable in order to secure financing. Our concerns about reliance upon speculative future transit expansions were met with statements to the effect that because Zoning Board members would like to believe that the transit expansion will go forward, they will plan on it. Similarly, our concerns about drawing added population and car traffic to what is already a busy area were also batted away, with one board member commenting that we would be much better off.

Today, we live across from a field of grass— we will not be better off with a parking garage. Nevertheless, we recognize the need for continuing development and optimal use of land in this urban setting. The nearby intersection of Lexington, West 7th, and Montreal certainly needs work, and there is a growing shortage of affordable housing in the city, but the current proposal is shortsighted and contrary to the goals of the Comprehensive Plan. Our neighborhood is now what is envisioned for the entire city in the Plan— a mix of single and multi-family residences, businesses, and transit. This proposed project undermines that vision by altering the essential character of the neighborhood. We support sensible, beneficial new development, but we cannot support development that does not comply with current zoning and the Comprehensive Plan.

We urge you to reject the proposed changes in zoning and any variance or conditional use permit, and to require that new development meet existing regulations and the goals of the Saint Paul Comprehensive Plan. Thank you for your consideration.

Sincerely,



Paul M. Hirsch



Kathryn L. Hirsch