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: 462.00
Tentative Hearing Date: To BE Scheduled

PD = 11
# 2829234100 37

APPELLANT

Name Brett and Laura Ripley Email brettripley@gmail.com
Address 1679 Hubbard Ave.
City St. Paul St. MN Zip 55104 Daytime Phone 218-329-7759

PROPERTY LOCATION

Zoning File Name Brett and Laura Ripley
Address / Location 1685 Taylor Ave.

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: June 1, 20 18 File Number: 18-050-373

GROUNDS 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.

The Planning Commission erred in not granting legal non-conforming status to the property as a 4 unit dwelling
1. The Planning Commission should have determined that the property - based upon its history, current layout, and extensive cost to remodel - could not be reasonably or economically used as anything other than a 4 unit dwelling.
2. The Planning Commission should have determined that the proposed use as a 4 unit dwelling is equally or more appropriate than a 1, 2, or 3 unit dwelling.

Attach additional sheets if necessary

ck 1257
462.00

Appellant's Signature [signature] **Date** 6/6/18 **City Agent** pdd 6-11-18

Rev 9/4/14

McCLAY · ALTON, P.L.L.P
ATTORNEYS

ROBERT M. McCLAY
BRIAN D. ALTON*

*Also Licensed in Wisconsin

951 GRAND AVENUE
ST. PAUL, MN 55105
FAX: 651-290-2502
651-290-0301

June 8, 2018

HAND DELIVERED
Lucy Thompson, Planning Administrator
City of St. Paul
Department of Planning and Economic Development
1400 City Hall Annex
25 West Fourth Street
Saint Paul, MN 55102-1634

RE: 1685 Taylor Avenue

Dear Madam or Sir:

On behalf of Brett and Laura Ripley please find enclosed an Application for Appeal to the City Council of the decision of the Planning Commission regarding the above referenced property. Also enclosed please find the filing fee.

Please process this application in the usual manner. Please contact our office if you need any additional information.

Very truly yours,

Brian D. Alton
brian@mcclay-alton.com

BDA:mm
Enc.

cc: Brett and Laura Ripley
Shari Moore, City Clerk

RECEIVED
JUN 11 2018
BY: