



May 25, 2021

**Via Email**

Office of the City Council  
City of Saint Paul  
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Saint Paul, MN 55102-1615  
legislativehearings@ci.stpaul.mn.us  
councilhearing@ci.stpaul.mn.us

**Re: Appeal for Property at 2233 Energy Park Drive**

Saint Paul City Council and Legislative Hearing Officer Ms. Marcia Moermond:

This letter is written testimony to be added to the record for the City Council Public Hearing scheduled for May 26, 2021 at 3:30 p.m. in connection with pending appeal concerning the property located at 2233 Energy Park Drive, Saint Paul, Minnesota 55108 (“the Property”). The Property is owned by Park Crossings, Inc. (“Park Crossings”), which is managed by Wellington Management, Inc. (“Wellington”).

We will address two issues in this letter. First, we would like to clarify that Park Crossings is not challenging compliance with the City of Saint Paul’s summary abatement order. Rather, Park Crossings will be filing a request for an encroachment permit that will allow removal of the boulders from the boulevard on the Property. However, second, and more importantly, we would like to address the significant public safety and traffic concerns that exist at the intersection of Energy Park Drive and Raymond Avenue (“the Intersection”). We urge the City of Saint Paul, the Public Works Division, and Ramsey County to take action to fix the Intersection to resolve the safety risks and traffic concerns as soon as possible.

**I. Compliance with Summary Abatement Order.**

Park Crossings and Wellington are not challenging the summary abatement order and will take prompt action to remove the alleged nuisance. We intend to apply for an encroachment permit to remove the boulders. However, since we do not anticipate that the

work will obstruct the flow of traffic, we do not believe there is a need to apply for a traffic permit.

Provided that there are no delays in the Saint Paul Public Works Division approving the encroachment permit application, Park Crossings believes that it will be able to remove the boulders by the proposed compliance deadline of June 30, 2021.

## **II. Pedestrian Safety Risks and Traffic Issues at the Intersection.**

It is important for the City Council to understand that the removal of the boulders does not remedy the serious safety and traffic concerns that exist at the Intersection. Indeed, the very reason that Park Crossings installed the boulders on the sidewalk was to prevent and deter semi-trucks from driving onto the sidewalk, a situation that causes great danger to pedestrians and bicyclists. Since the installation of the boulders, fewer trucks have driven on the sidewalk since they need to avoid the boulders. Removing the boulders – without any other changes to the Intersection – will not make the Intersection any safer and will simply encourage semi-trucks to continue to drive on the sidewalk when making left-hand turns from Raymond Avenue to Energy Park Drive. Below is a summary of the traffic issues at the Intersection and several proposed improvements that can easily improve the situation and make the Intersection safer for pedestrians, bicyclists, and motorists.

As the City Council may be aware, there are a significant number of semi-trucks and other heavy vehicles that regularly drive through the Intersection. The trucks typically drive north on Raymond Avenue and take a left turn onto Energy Park Drive so that they can access Highway 280. When trucks turn left onto Energy Park Drive there is simply not enough space on the road to make the turn.<sup>1</sup> In order to avoid hitting vehicles driving east on Energy Park Drive,<sup>2</sup> the trucks are forced to drive onto the sidewalk in front of the Property.<sup>3</sup> At the same time, vehicles traveling east on Energy Park Drive that are waiting at the Intersection frequently have to drive backwards to accommodate the trucks turning left. Numerous Wellington employees, including myself, have witnessed this scenario repeatedly unfold as they drive to and from our office located at 1625 Energy Park Drive. Ultimately, the traffic pattern at the Intersection creates a dangerous situation where trucks could easily strike a pedestrian walking or a bicyclist riding on the sidewalk of Energy Park Drive, and the trucks turning left cause a significant disruption to the flow of vehicle traffic

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<sup>1</sup> See Attachment 1 (showing the left turn on to Energy Park Drive from Raymond Avenue).

<sup>2</sup> See Attachment 2 (showing the vehicles driving east on Energy Park Drive), and Attachment 3 (Traffic study performed by Wenck Engineering).

<sup>3</sup> See Attachments 4 and 5 (showing the damage from the truck's tire tracks).



through the Intersection. Further, semi-trucks and heavy vehicles repeatedly driving onto the sidewalk will undoubtedly cause damage over time and require early repair or replacement of the sidewalk.

Park Crossings and Wellington have identified three improvements that should be made to the Intersection, which will improve pedestrian and motorist safety, and improve the flow of traffic.

First, we ask for the City's assistance to restripe the traffic lines and put in a stop bar on the west side of the Intersection on Energy Park Drive. The traffic lines should be moved to the south by a few feet and the stop bar should be painted further west to encourage vehicles to stop at a location that would allow trucks sufficient room to make the left turn onto Energy Park Drive. The Public Works Division has already stated that restriping the traffic lines is a feasible request that can be completed by June 30th. The City should ultimately bear these costs.

Second, at the Division of Public Work's recommendation, we plan to widen the driveway where vehicles enter the gas station at the Property. This change will provide additional room for the vehicles entering the Property's parking lot.

Finally, we request that the City of Saint Paul work with Ramsey County to widen Energy Park Drive (County Road 32) at the Intersection. For example, the sidewalk on the northwest side of the Intersection is wider than necessary (it is the width of a normal sidewalk plus the width of the boulevard). Making that portion of the sidewalk more narrow, and thereby widening the traffic lane, would provide trucks sufficient room to make the left turn onto Energy Park Drive without having to drive onto the sidewalk. This solution would accomplish what should be the City's primary goal – ensuring pedestrian and bicyclist safety on the sidewalk while at the same time ensuring smooth traffic patterns.

Park Crossings and Wellington are committed to City of Saint Paul and have a long history of working with the City to develop and manage commercial and residential properties. We hope that the City will address our concerns and work to improve the issues at the Intersection. While we are committed to removing the boulders at the Intersection, we also firmly believe that it is necessary for the City to address the serious safety and traffic issues present at the Intersection and which precipitated our decision to install the boulders in the first place.



Thank you for your time and consideration with respect to this matter. Please feel free to call or email me to discuss next steps with respect to improvements that can be made to the Intersection.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized letter 'D' followed by a long, sweeping horizontal line that tapers to the right.

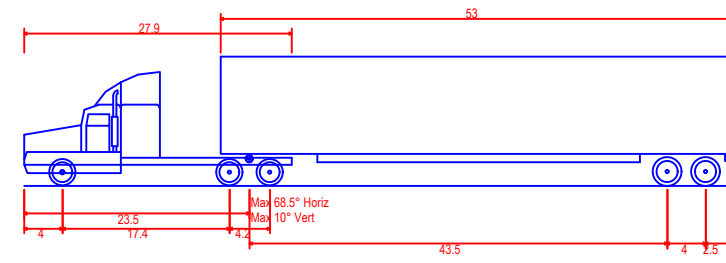
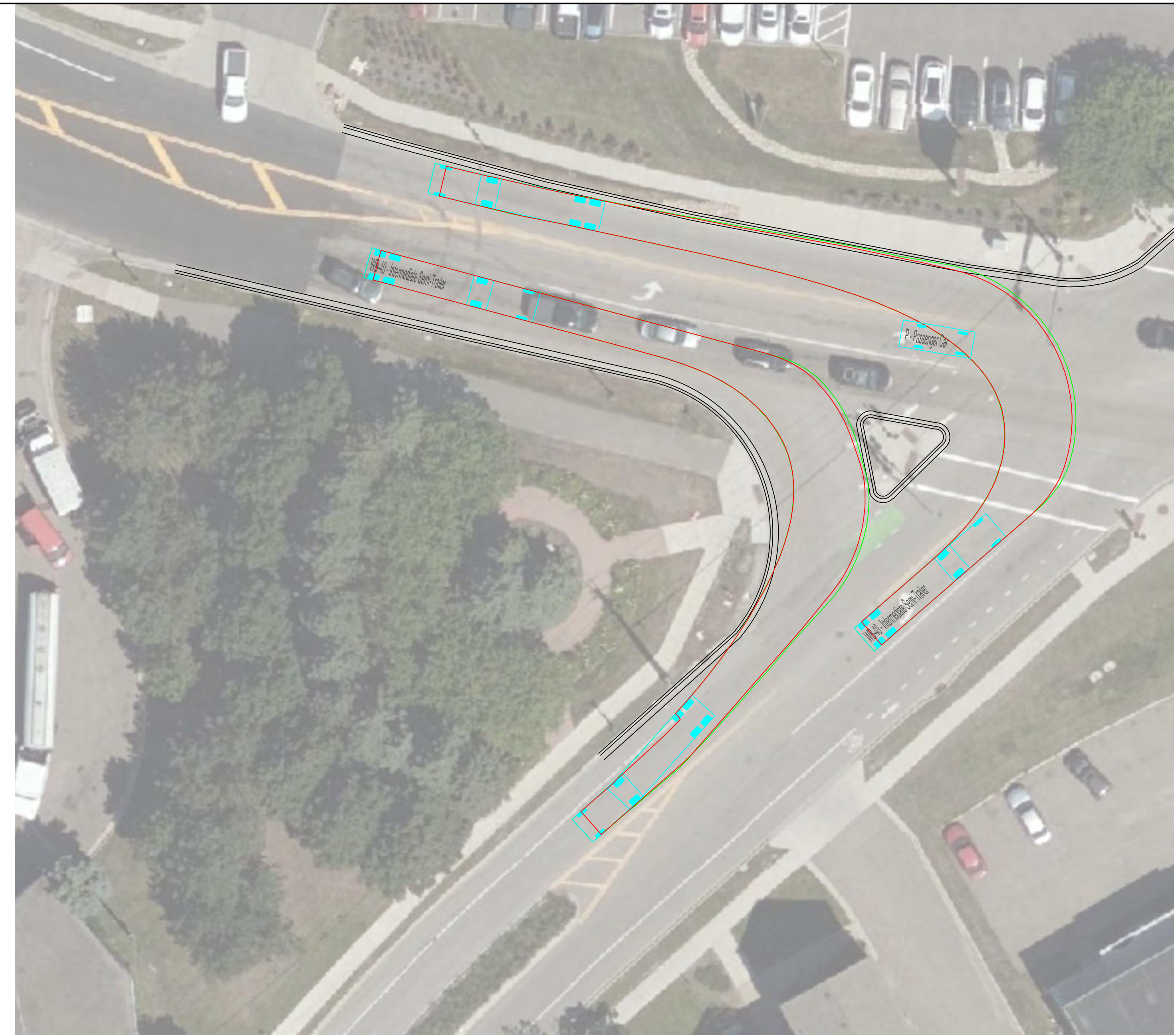
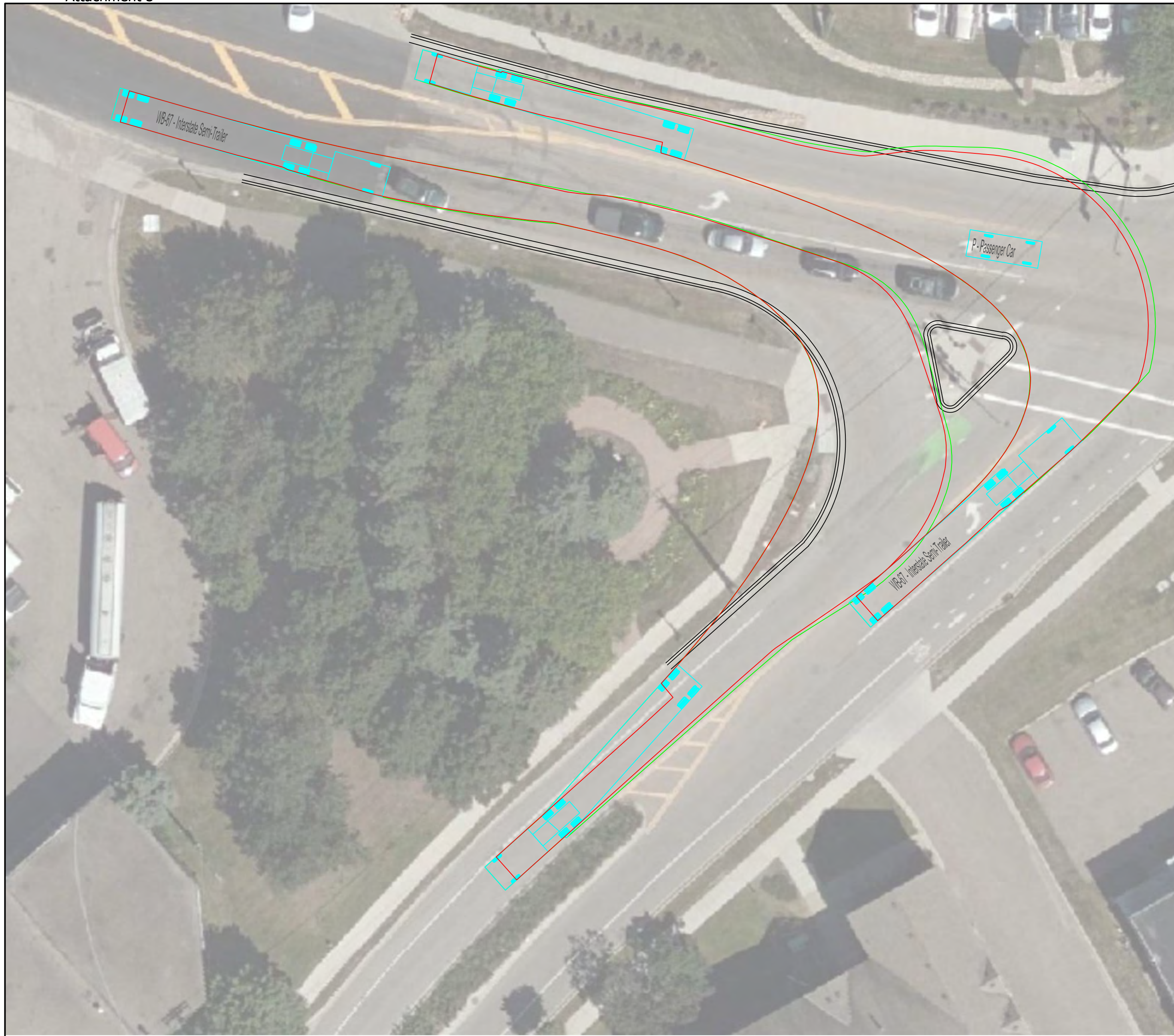
David Wellington

cc: Mr. Stephen B. Wellington, Jr. (*via email*)  
Ms. Kim Donat (*via email*)

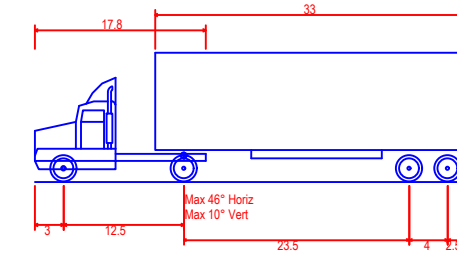








**WB-67 - Interstate Semi-Trailer**  
 Overall Length 73.50ft  
 Overall Width 8.50ft  
 Overall Body Height 13.50ft  
 Min Body Ground Clearance 1.334ft  
 Max Track Width 8.50ft  
 Lock-to-lock time 5.0s  
 Max Steering Angle (Virtual) 26.4°



**WB-40 - Intermediate Semi-Trailer**  
 Overall Length 45.49ft  
 Overall Width 8.00ft  
 Overall Body Height 13.50ft  
 Min Body Ground Clearance 1.334ft  
 Track Width 8.00ft  
 Lock-to-lock time 4.0s  
 Max Steering Angle (Virtual) 20.30°

**WENCK**  
 7500 OLSON MEMORIAL HWY  
 SUITE 300  
 GOLDEN VALLEY, MN 55427  
 PHONE: 763-252-6800  
 FAX: 952-831-1268  
 WWW.WENCK.COM

SUB CONSULTANT:  
 CLIENT:  
 2233 ENERGY PARK DR

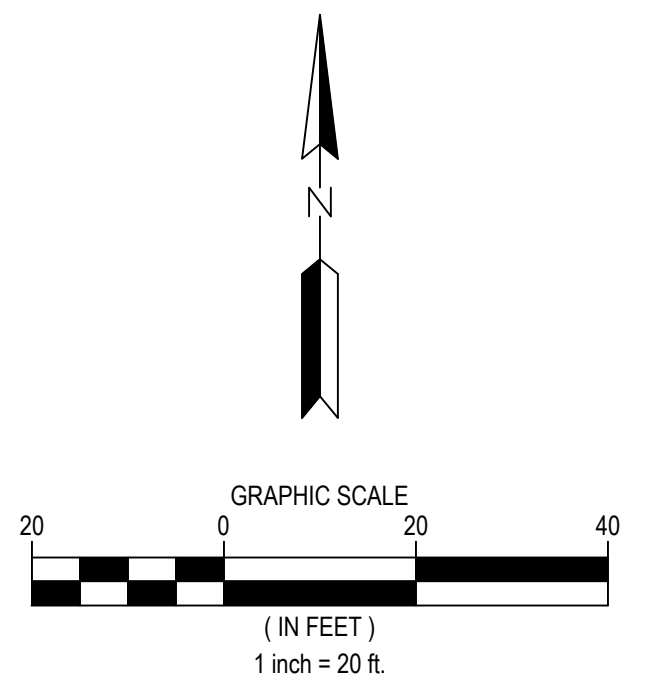
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**2233 ENERGY PARK DRIVE**  
 2233 ENERGY PARK DRIVE  
 ST. PAUL, RAMSEY COUNTY, MINNESOTA

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REV#1	REV#1 DESCRIPTION	REV#1 DATE
REV#2	REV#2 DESCRIPTION	REV#2 DATE
REV#3	REV#3 DESCRIPTION	REV#3 DATE
REV#4	REV#4 DESCRIPTION	REV#4 DATE
REV#5	REV#5 DESCRIPTION	REV#5 DATE
REV#6	REV#6 DESCRIPTION	REV#6 DATE
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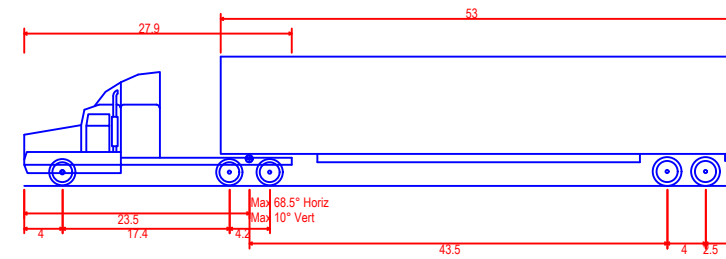
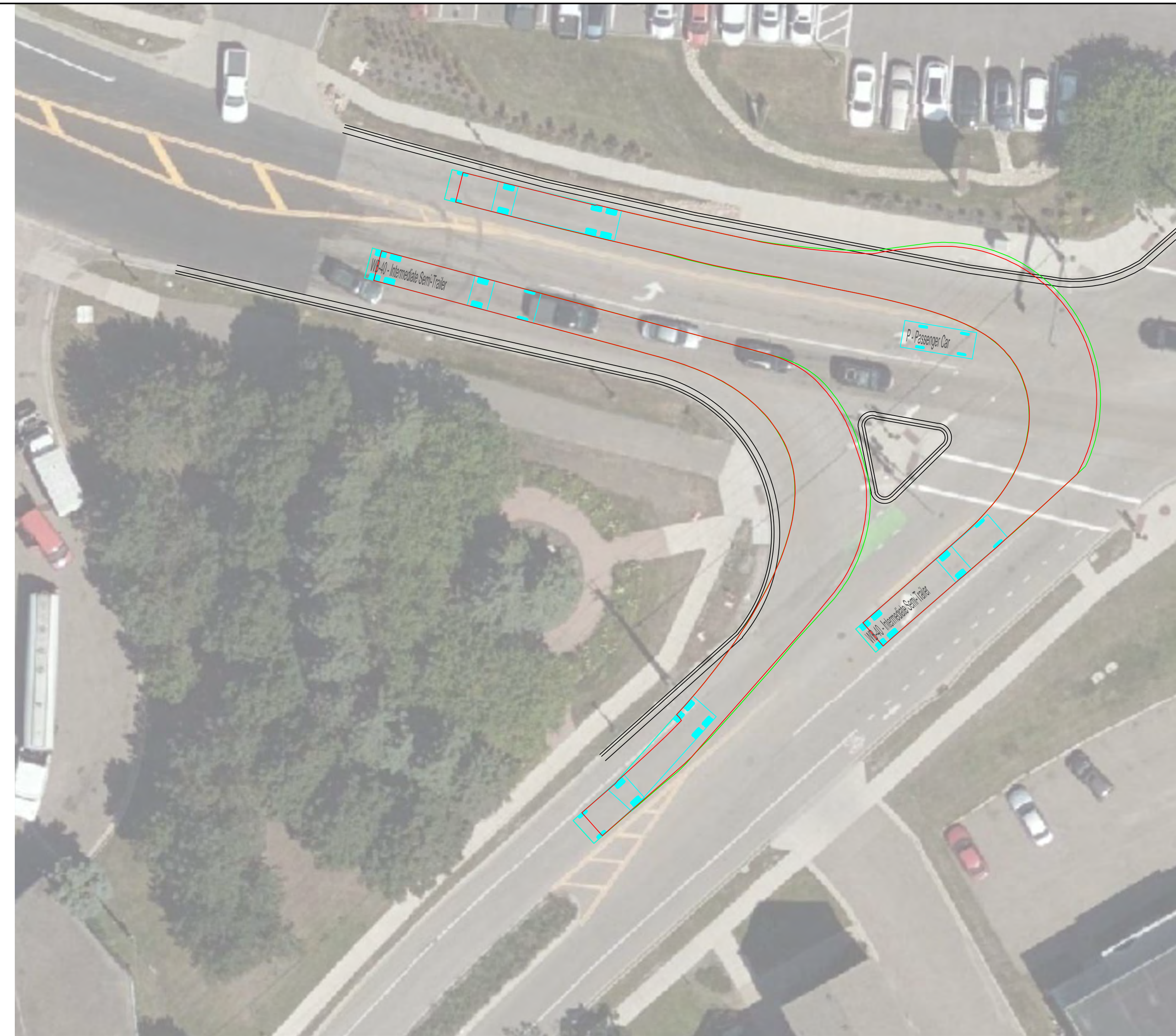
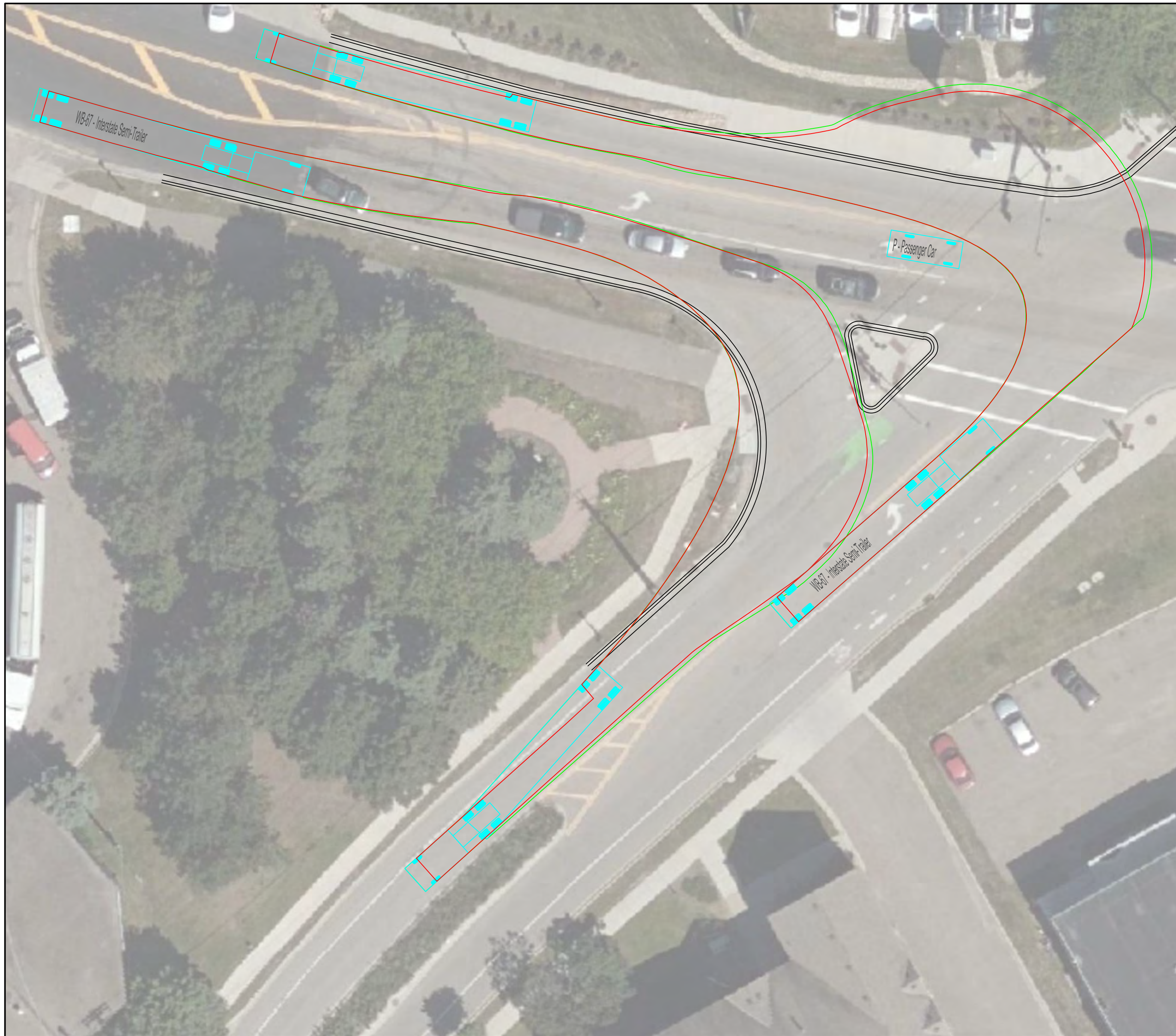
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**NOT FOR CONSTRUCTION**

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 CHK'D BY: ###  
 APP'D BY: RAG  
 ISSUE DATE: 01/07/2021  
 ISSUE NO.: 1

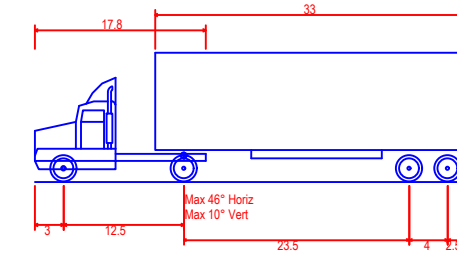
SHEET TITLE:  
 TURNING MOVEMENT  
 EXHIBIT  
 SHEET NO.:  
**EX-1**







WB-67 - Interstate Semi-Trailer  
 Overall Length 45.00m  
 Overall Width 2.55m  
 Overall Body Height 3.50m  
 Min Body Ground Clearance 1.334m  
 Max Track Width 8.500m  
 Lock-to-lock time 6.00s  
 Max Steering Angle (Virtual) 20.30°



WB-40 - Intermediate Semi-Trailer  
 Overall Length 45.49m  
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 Overall Body Height 3.50m  
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SUB CONSULTANT:

CLIENT:

2233 ENERGY PARK DRIVE

PROJECT TITLE:  
**2233 ENERGY PARK DRIVE**

2233 ENERGY PARK DRIVE  
 ST. PAUL, RAMSEY COUNTY, MINNESOTA

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REV#4	REV#4 DESCRIPTION	REV#4 DATE
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REV#9	REV#9 DESCRIPTION	REV#9 DATE

CERTIFICATION:

**NOT FOR CONSTRUCTION**

PROJECT NO.: ###

DWN BY: MDH    CHK'D BY: ###    APP'D BY: RAG

ISSUE DATE: 01/07/2021

ISSUE NO.: 1

SHEET TITLE:

TURNING MOVEMENT

EXHIBIT

SHEET NO.:

**EX-2**

