

From: [Jill Peuranen](#)
To: [*CI-StPaul Contact-Council](#); [CouncilHearing \(CI-StPaul\)](#)
Cc: [Jill Peuranen](#)
Subject: request to include attached comments to city council file 22-051684 ABZA 23-1
Date: Tuesday, July 11, 2023 7:30:03 AM
Attachments: [22-051684 ABZA 23-1 comments Jill Peuranen.pdf](#)

Hello,

I've attached a pdf of comments for inclusion in the file 22-061684 ABZA 23-1
I understand comments are required to be submitted no later than noon today to be included
for council meeting 3:30pm Wed July 12.

Please confirm receipt of this email and comment file.

Thanks,
Jill Peuranen
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July 10, 2023

Attention: Saint Paul City Council
Board of Zoning Appeals
Department of Safety and Inspections

Regarding: File 22-051684 / ABZA 23-1 (2285 Hampden, LLC variance requests)

Summary of purpose:

I strongly urge you to uphold the Board of Zoning Appeal's May 30, 2023 unanimous decision denying all four variances requested by 2285 Hampden, LLC.

Hello,

This statement may be content dense, but this issue is important to me. I appreciate your time and consideration. I strongly urge you to uphold the Board of Zoning Appeal's May 30, 2023 unanimous decision denying all four variances requested by 2285 Hampden, LLC. My reasoning follows.

My primary concerns echo the points raised in the staff report and meeting notes dated May 30, 2023. I'll present them by topic.

I1 district mixed-use:

I am concerned regarding the applicant's apparent disregard or misunderstanding of the very definition of I1 mixed-use as evidenced by the request for only 6.5% commercial on ground floor. For this reason alone, denial of appeal should be upheld. This request simply doesn't meet basic requirements.

2040 Comprehensive Plan:

The applicant's request camouflages a de facto primarily residential project as a mixed-use project in an I1 zone which does not appear to align with the strongly cautioned 2040 plan intention to retain and protect current industrial lands.

If constructed, 2285 Hampden would (hopefully) be around for quite some time. Approving the requested variances today, in the manner requested, I feel would compromise the intention of the 2040 plan's industrial guidelines. I question if it would negatively impact the city well past 2040 by leading in a direction towards converting industrial without due process or due respect of the intent and cautions of the 2040 plan, as well as massaging existing zone definitions and restrictions. I question the danger of setting precedents which could lead to further erosion of

2040 guided industrial zones. I am especially concerned as 2285 Hampden lies on an identified vulnerable land use edge.

Along with the 2040 plan's support of high density affordable housing in close distance to mass transport, the 2040 plan also stresses the need to support industrial zones as necessary for the economic strength and vitality of our city.

I see clear evidence of housing support evidenced by the 2,065 high density housing units developed within 1 mile of 2285 Hampden, and my home at 2301 Long Ave, within the past few years in Saint Paul (see Table 1). I'm sure you are all aware of them and I may have missed a few. There is an even greater number of new high density housing units constructed just across the border in Minneapolis. I do not know what percentage of those would be considered affordable. I see the commitment to housing. It's harder to see the commitment to industrial zones in practice.

I am concerned this development may prove unsustainable and create further problems down the road. I believe the continued growth of high-density housing development at its current rate may exacerbate the problem and up the need for greater support of industrial zones as committed to within the 2040 plan.

25' building setback requirements

The defined purpose of the 25' setback is to buffer residential from industrial. Hampden Avenue is industrial and sees high level of industrial traffic. (I support the traffic related concerns raised previously by my neighbors and by the Saint Anthony Park Community Council in their submission dated June 27, 2023, but which are outside the scope of today's meeting.)

As the applicant has shown, all properties directly north, south, east and west are industrial save a small swatch of townhomes on other side of Hampden Avenue. The surrounding industrial area is large. Maintaining the 25' buffer requirement could be a godsend to future tenants.

The 25' setback was developed as a reasonable standard. Fully complying with the 25' buffer plays a significant role in safeguarding the health, safety and standard of living experienced by future residents of 2285 Hampden. If 2285 Hampden is primarily a residential building, which is appears to be, it becomes even more imperative that the 25' setback is enforced.

As "Hampden Avenue is a Vulnerable Land Use Edge calling for improved buffering as a 'key tool' in reducing residential/industrial conflicts", proposing a mere 50% of the project meet the 25' setbacks is insufficient and does not respect the identified need and nature of the distinction.

As this is a proposed project, there are no voices to speak today regarding the impact of living with a reduced setback in this specific industrial area. It falls to you to consider the impact this could have on their lives over the next 5-50 or more years.

As it stands today, this industrial area of Hampden Avenue does not have a consistent look and feel. It's not a pretty suburban industrial park. It's a mish mash of industry with no consistency. There are 5 industrial buildings spanning from 2285 Hampden through the 2 blocks to the Raymond/Hampden intersection. 2 appear to be 9' setback, 1 has 0', 1 is angled with only a point of the building at ~9' setback with remaining much larger, and 1 wavers between 9' to maybe 5' and 0'. This proposed building would not be an industrial building, nor apparently even true mixed-use, so I question why it should try to fit-in with 5 surrounding industrial buildings with reduced setbacks?

Certainly the 9' setback proposed by the applicant may put 2285 Hampden in slightly better standing than their current direct industrial neighbors, and would be a small step up from the current industrial 0' setback which works because no one lives there, but why is it acceptable to lower buffering setback standards for this affordable residential project plopped into an industrial zone?

If done right, there is a good chance the required 25' setback would prove to make the project more appealing to future tenants and have a positive impact on occupancy rates.

This project has the potential to positively impact the standards of the neighborhood while setting a desirable tone for future development. If done right. With a creative outlook and diligence towards the letter and intent of existing zoning and the 2040 guidelines, the project could be adjusted to meet all variances and create a much better living experience and commercial opportunity until 2040 and beyond.

Front yard parking:

2 front yard parking spots are not an issue for me.

6.5% ground level commercial:

I fully understand the point raised by the applicant regarding ground floor vacancy rates in developments with upper floor residential. It's a tricky one. But the solution is not to intentionally design token tiny spaces that won't meet most business owner's needs, so that profit loss is minimized for the owner when they remain vacant. Request for this variance does not meet criteria as "economic considerations alone do not constitute practical difficulties" and denial should be upheld.

There's a real opportunity for 2285 Hampden to raise to the challenge and develop a meaningful commercial offering which fully complies with I1 multi-use guides and benefits the city while turning a profit.

As stated in the meeting notes on file, commercial vacancy rates may result from any number of causes: new developments which haven't had the time to establish commercial tenants, developers who may not have actively pursued commercial tenants to their full ability, developers who have misjudged market needs, developers who built intentionally smaller spaces to safeguard profits. Or it may be just not the right time, or the right place.

Current stats may be concerning but are not necessarily a good predictor of the future commercial needs which can be met within mixed-use projects in the long-term. Just because they may not be the most profitable right now, does not mean that they won't be throughout the future. As presented, 2285 Hampden is not just a development for the short-term future but hopefully would have staying power and could play a role in the solution long term.

2285 Hampden brought up the safety concern regarding vacant(dark) commercial spaces. I didn't understand their point that some vacant commercial space in a mixed-use development with thriving upper residential floors creates a safety issue to the neighborhood. Nor how this 'safety' issue speaks to true intentions of 6.5% variance request.

With the large number of new high-density housing units on the market (2,065 Table 1) or soon to be, I am also concerned regarding potential occupancy challenges 2285 Hampden may face specifically due to its location within an industrial zone which Mr. Elkins described in the meeting notes as "its adjacent neighbors are surface areas that have chain link fence and barbed wire on top of them where they store tractor-trailers". If done right, 25' setbacks and a healthy complement of commercial tenants could be a deciding factor to help potential residents overlook this and decide to move in.

Summary:

I am a long-term homeowner (30+ years) whose residence is less than 300 feet away from the proposed project at 2285 Hampden Avenue. I have direct sightlines to the property. I have experienced a multitude of change within my neighborhood over the years and am (usually) a large proponent of positive growth and change.

I supported Exeter's plan in 2018 to maintain the current structure at 2285 Hampden and convert it into office space - which would have been a fitting use for its I1 zoning. I was disappointed when that project did not come to fruition. I have grown increasingly dismayed and concerned as the property owner has allowed the space to become, in their own words, "a long-vacant, dilapidated property"(June 9, 2023 appeal application). I have included current photos of the property below (Images 1-5). As much as I would like to mitigate the current existing blight of 2285 Hampden, I cannot support this current project with the requested variances for the multiple reasons listed above.

Please uphold the Board of Zoning Appeals decision denying all variance requests.

Thank you,

Jill Peuranen

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Image 1-4

Photos taken July 10, 2023 of existing 2285 Hampden Ave property



Table 1

New high density housing development within 1 mile of 2285 Hampden project and my home at 2301 Long Avenue. Data retrieved July 10, 2023 from New Dwellings – Census – Approved Building Permits data set, information.stpaul.gov

2424 Territorial Road	203 units
2383 University Ave W	220 units
2700 University Ave W	248 units
778 Berry St	121 units
777 Berry St	241 units
735 Raymond Ave	108 units
2323 Charles Ave	79 units
2250 University Ave W	124 units
2227 University Ave W	154 units
2410 University Ave W	223 units
760 Raymond Ave	220 units
747 Hampden Ave	124 units
Total	2065 units