



October 29, 2025

Chair Cheniqua Johnson
Commissioner Anika Bowie
Commissioner Rebecca Noecker
Commissioner Saura Jost

Commissioner Molly Coleman
Commissioner Hwa Jeong Kim
Commissioner Nelsie Yang

Re: SR 25-227 — Proposed Amendments to the 2026–2027 Qualified Allocation Plan

Dear Chair Johnson and HRA Commissioners,

On behalf of the Saint Paul Downtown Alliance, I write to express our strong support for the proposed amendments to the 2026–2027 Qualified Allocation Plan (QAP). This update would allow Saint Paul to leverage newly expanded federal Low-Income Housing Tax Credits to create more affordable housing and advance downtown office-to-residential conversions – without relying on additional local tax tools such as TIF.

Downtown Saint Paul is at a pivotal moment. Like many urban centers nationwide, we are navigating the long-term effects of hybrid work and evolving office demand. At the same time, we have an unprecedented opportunity to reimagine downtown as a vibrant, mixed-use district that serves more residents, supports local businesses, and contributes to the city's overall fiscal health. The proposed QAP amendments provide a practical and fiscally disciplined way to accelerate that transition by drawing private investment into adaptive reuse projects that restore energy and activity to the city's core.

Importantly, this proposal aligns squarely with the Downtown Investment Strategy, which calls for catalytic housing development and office-to-residential conversions as key pathways to long-term economic resilience. By prioritizing these conversions through the QAP scoring process, Saint Paul will advance one of the Strategy's most immediate and achievable goals: creating more downtown housing at a range of price points while strengthening the foundation for sustained growth.

The Downtown Alliance has long championed this direction, working alongside our partners to attract residents, encourage ground-floor activation, and support a thriving ecosystem of employers, arts organizations, and small businesses. In the past two years, we've seen more than 350 new housing units come online through projects like Landmark Towers and The Stella, reflecting clear demand for urban living. The proposed QAP amendments build on this momentum, offering a new, cost-effective tool to deliver more housing without additional burden on Saint Paul taxpayers.

We appreciate the City's leadership in advancing this forward-thinking proposal and urge your support for SR 25-227. I also look forward to testifying in person at next week's hearing to share more about the importance of this step in realizing the shared vision of a stronger, more connected downtown Saint Paul.

Sincerely,

A handwritten signature in blue ink that reads "Joe Spencer".

Joe Spencer
President, Saint Paul Downtown Alliance