

Oppose*

Neal, Roy and Anne

Greenwood, Rosario

Erickson, Lisa

Hilbert, Jim NAACP

Ghei Gita

Spaulding, Bob

District 10 Como Park Community Council

****Letters received after packet was created***

1231 Minnehaha Ave W, Saint Paul

1111 Argly St, Saint Paul

1894 Wordsworth Ave, Saint Paul

270 North Kent St, Saint Paul

1158 Churchill St, Saint Paul

1153 Churchill St, Saint Paul

recommended labeling the site plan

Langer, Samantha (CI-StPaul)

From: Roy Neal <rneal@straightlinetheory.com>
Sent: Thursday, December 13, 2018 11:06 PM
To: Williams, Josh (CI-StPaul); Anderson, Tia (CI-StPaul)
Cc: district10@district10comopark.org; Maggie Zimmerman; Kevin Anderson
Subject: I Oppose Variances that Would Enable Demolition of St. Andrew's in Warrendale

Hi Josh and Tia,

I am writing to strongly oppose the variance requests and site plan proposed by the Twin Cities German Immersion School (TCGIS).

TCGIS claims their plan won't harm neighborhood character. TCGIS' claim should not be taken lightly. I focus my comments on that claim, which is part of their presentation to the zoning committee.

While the variance requests seem minute—1% here, 3 feet there—the effect of these seemingly small requests would be outsized, dramatic and devastating for the neighborhood. Tiny numbers can be deceptive. They hide the tremendous impact this proposed plan would have on the tiny residential pocket neighborhood of Warrendale. If these variances are granted, they will start a chain reaction that results in the demolition of the symbolic heart of a St. Paul neighborhood. Warrendale is a small neighborhood with a large, iconic building at its heart. These small variances could alter the neighborhood forever. We should all care about that.

Variances should be mindful of the impact on the character of the neighborhood. It's hard to imagine a plan that could damage the historic character of Warrendale more. Their plan guts Warrendale's character by replacing its century-old heart with a utilitarian building designed to maximize internal space. They claim that they are simply swapping a school for a school. That's deceiving. The new plan would be a poor successor to the landmark historic St. Andrew's building, now found to be worthy of historic designation by the Heritage Preservation Commission (HPC).

TCGIS claimed "the existing structure is much taller than the height of the proposed new school building. As a result, even with the variance the new building will fit more with the scale of surrounding structures." So, they claim that the proposed building will fit in better *than a building that was built in Warrendale nearly a century ago* and has been the heart of the community! That makes no sense and shows a profound lack of empathy for the neighborhood's history.

TCGIS also claimed that the new building will be "less imposing" than St. Andrews—as if the removal of a grand, proud building is somehow a benefit to the neighborhood. So Warrendale is supposed to be happy that TCGIS wants to cut down the imposing heart of the neighborhood, an old-growth tree, and replace it with—a bush? Again, this shows a profound disconnect between the TCGIS plan and the neighborhood they recently moved into.

TCGIS claims that the variance will allow easier access to the building because "we don't have to incorporate steps," yet there are stairs. The new design's south facade includes a large flight of stairs, about where St. Andrew's stairs are now. If they are referring to another facade, accessibility could be incorporated into the existing building, too. Not exactly a compelling reason to adopt a new plan.

TCGIS claims that about 20% of staff do not drive a car to work, therefore they need only 20 on street parking spots. But they "attribute this in part to the fact that many of our teachers are from Germany, who stay for 1 to 3 years and do not invest in cars." I live near 2 TCGIS teachers from Germany. They have two cars. Parking is a contentious issue in Warrendale so getting the figures the right is important.

TCGIS claimed that the architect of the historic building wasn't important. Wrong again. We discovered that the former St. Andrew's was designed by none other than Charles A. Hauser, St. Paul's first architect, a progressive leader of his era, and author of the first St. Paul city building code. He has several St. Paul office and manufacturing buildings on the National Historic Register. HPC ruled that St. Andrew's deserves to take its place among his respected works. Yet after hundreds of hours of research and a special visit to city hall by Jen Hausler, Charles A. Hausler's granddaughter, TCGIS has refused to change course. They refuse to see the building as an historic resource which, according to Minnesota state statute (MERA), should be protected like a natural resource.

St Paul's Comprehensive Plan and the Neighborhood Plan call for preservation and sustainable neighborhoods. Both plans call for sustainable use of St. Paul's resources, reuse of historic buildings, and maintenance of the elements that define Warrendale as historic and residential. TCGIS' proposed plans violate these points. Approval of variances for the flawed site plan will cause harm.

TCGIS' plan was called "a terrible plan" by the dean of the University of Minnesota Design School. Dr. Tom Fisher made his remarks during a community forum on October 11, 2018. His thoughts were echoed by several other school design experts who attended. Dr. Fisher offered to work with the school to find better ideas for adaptive reuse that would better fit the city comprehensive plan, and SHSA offered to participate in a design charrette to help find win/win solutions, but TCGIS refused. They are now radar-locked on a single, inflexible plan that requires variances to proceed, but will need neighborhood acceptance to succeed. Success seems unlikely.

Any notion that TCGIS suffers "due to circumstances unique to the property" is untrue. TCGIS used the building as a school for 5 years. In 2014, they claimed to be happy with the property, according to their own internal documents. There is nothing inherently difficult about using the property for a school—as *they have done for 5 years*. The property didn't force the school to add another section. This guideline makes it clear that the variance was meant to offer landowners relief from onerous or unsolvable situations caused by the property itself. This is not one of those situations. They have other options.

TCGIS says they want to "deepen our roots and stay in the Como neighborhood." They don't need to cut down the biggest old-growth tree in the neighborhood to do that. We hope that by rejecting or postponing the current variance request, TCGIS will be encouraged to meet with the community to create a better plan that respects the entire community.

I urge the zoning committee to consider the impact seemingly insignificant variances could have on the community of Warrendale. Zoning is meant to ensure good development and preserve what's good about St. Paul. This is a great opportunity to apply zoning as it was meant to be done.

I want TCGIS to succeed—its future is solid—but not at the expense of everyone else who loves the neighborhood's character and history.

Cheers,

Roy & Anne Neal
1231 Minnehaha Ave W
St. Paul, MN
55104

Langer, Samantha (CI-StPaul)

From: Rosario Greenwood-Sanchez <rsangreen7@yahoo.com>
Sent: Sunday, December 16, 2018 9:10 PM
To: Anderson, Tia (CI-StPaul)
Cc: Dubruiel, Paul (CI-StPaul)
Subject: Please, deny variances to TCGIS

Please, do not grant the variances for parking, height and area to permit the demolition of former Saint Andrew's historical building. With public funding, developers and TCGIS want to destroy this architectural jewel of Saint Paul, and build instead an ordinary square building adorned with a canopy; the proposed building resembles more like a big box commercial store. The demolition of Saint Andrews changes the character of the Como/Warrendale neighborhood. Once gone, this architectural work of art will be unattainable as no one can reproduce such work of art in our time. This building is a legacy of good people, a testament of those who worked hard to honor future generations, expressing their high ideals in bricks, stone and multicolor ceramic roof tiles. They live in us and our children as we continue with their legacy, that is why we, residents of the Como/Warrendale neighborhood give our all in order to preserve this magnificent historic building.

Thanks for being good stewards of the city of Saint Paul

Sincerely,

Mrs. Rosario Greenwood
1111 Argyle Street
Saint Paul, MN 55103

Sent from my iPad

Langer, Samantha (CI-StPaul)

From: Lisa Erickson <lisaenyc@hotmail.com>
Sent: Thursday, December 13, 2018 7:36 PM
To: Anderson, Tia (CI-StPaul)
Cc: Williams, Josh (CI-StPaul)
Subject: Re: Former TCGIS family says that the school needs to move - they knew their design was flawed and the school would outgrow their design in 6 years

Lisa Erickson
1894 Wordsworth Ave
St Paul, MN 55116

From: Anderson, Tia (CI-StPaul) <Tia.Anderson@ci.stpaul.mn.us>
Sent: Thursday, December 13, 2018 6:44 PM
To: Lisa Erickson
Cc: Williams, Josh (CI-StPaul)
Subject: RE: Former TCGIS family says that the school needs to move - they knew their design was flawed and the school would outgrow their design in 6 years

Lisa Erickson,
Thank you for your feedback and insight. If you would like your email to be included in the public record as testimony we require both a name and street address. Please confirm and provide an address if this is the case.

Tia



Tia Anderson

Senior City Planner

Department of Safety and Inspections

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Saint Paul, MN 55101

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From: Lisa Erickson [<mailto:lisaenyc@hotmail.com>]
Sent: Thursday, December 13, 2018 1:20 PM
To: Williams, Josh (CI-StPaul) <josh.williams@ci.stpaul.mn.us>; Anderson, Tia (CI-StPaul) <Tia.Anderson@ci.stpaul.mn.us>; district10@district10comopark.org; zimmermanstp10@gmail.com
Subject: Former TCGIS family says that the school needs to move - they knew their design was flawed and the school would outgrow their design in 6 years

Hello All -

My child has graduated from TCGIS so I feel somewhat "safe" now, but I still fear some backlash.

I speak for a dozen families when I say that we all knew that the design that the architect brought forth 7 years ago to the parents was flawed.

Anyone could do the calculations on the back of a napkin; why were they approving this poor design? The school was meant to outgrow that design within 6-7 years based on very simple outcomes.

The school, as it is now, has meager athletic facilities, no fields, a tiny library that is not readily accessible or available. A small auditorium. There is NO parking, and the school growing larger only reminds us of that fatal flaw.

TCGIS needs to move and to move now.

Tearing down the Church/Aula, will NOT solve their problems.

This is a school that will thrive for generations, I am certain of it. They need to find a better long term solution. What they have in mind for now serves no one, especially not the children!

Either they cap enrollment now (reduce to 2 incoming Kindergarten classes again) or they forfeit state money.

If they tear down the church, they will not solve their inherent problems, they will only create more and the community suffers. Greatly.

I have served on my District 16 Community board for 6 years, served on the Grand Ave Business Association board for 4 years. I know what it is like to be aggressive and assertive about holding out - for a while - for a better solution! BE STRONG. Stand up to Ted and Co. They just don't know what the heck they are doing. This is way above their pay grade.

I'm happy to speak on this, publicly, or privately. Call me.

Regards,
Lisa Erickson
612.227.7422

Langer, Samantha (CI-StPaul)

From: Hilbert, Jim <jim.hilbert@mitchellhamline.edu>
Sent: Wednesday, December 19, 2018 9:02 AM
To: Anderson, Tia (CI-StPaul); Williams, Josh (CI-StPaul); Corrie, Bruce (CI-StPaul)
Cc: Dianne Binns
Subject: Statement of the St. Paul NAACP for Zoning Committee Meeting 12/20/18
Attachments: Statement of St. Paul NAACP on Proposed Expansion of the German Immersion Charter School 12-19-18.pdf

Good Morning, Committee Members,

I am writing on behalf of the St. Paul NAACP to request that the attached public statement concerning the proposed expansion of the Twin Cities German Immersion Charter School be made part of the public record and included in your deliberations at tomorrow's meeting of the Zoning Committee of the St. Paul Planning Commission (matters #18-126-865 and #18-117-556).

I am unable to attend the meeting in person and would appreciate the inclusion of our statement, which was adopted unanimously by our Executive Committee at our meeting last night.

Please let me know if you have any questions or need anything further for inclusion of our statement.

Thank you for your consideration,

Jim Hilbert
Chair, Education Committee
St. Paul NAACP

cc. Dianne Binns, President, St. Paul NAACP



SAINT PAUL NAACP
Roy Wilkins Memorial Branch
270 North Kent Street
St. Paul, MN 55102

***St. Paul NAACP Statement
Concerning the Proposed Expansion of the Twin Cities German Immersion Charter School
December 19, 2018***

The St. Paul NAACP issues this statement in opposition to the proposed expansion of the Twin Cities German Immersion Charter School ("TCGIS"), because we believe that it will exacerbate the racial and socioeconomic segregation in the St. Paul schools.

In July 2016, during the 107th National Convention, delegates of the National NAACP unanimously passed a Resolution calling for a moratorium on charter school expansion. The NAACP National Board of Directors formally ratified the Resolution on October 15, 2016. As the text of that resolution states, one of the primary concerns that the National NAACP was addressing was that "charter schools have contributed to the increased segregation rather than diverse integration of our public school system."

The potential expansion of TCGIS is the type of charter school expansion that the NAACP Resolution specifically addresses. According to the Minnesota Department of Education, TCGIS' student population is 87% white, 13% students of color, and only 7% low-income (qualifying for free-or-reduced-price lunch). In stark contrast, the surrounding school district, St. Paul Public Schools, is 21% white, 79% students of color, and 68% low-income. Expansion of such a predominantly white and relatively wealthy charter school in the heart of the city would frustrate efforts to desegregate St. Paul schools and contribute to further racial and socioeconomic segregation.

The concerns of local educational policy are highly germane to the decision-making of any city governmental body. Racial and socioeconomic segregation in our schools is the responsibility of all government officials to eradicate, and it is certainly their obligation to avoid any decision to make things worse. Education has a special place in our society. The Minnesota State Constitution singles out education to receive special protection and requires unique obligations by the state to provide an adequate education to all students. Courts since *Brown v. Board of Education* have found that segregated education is both unconstitutional and immoral. We strongly urge the Planning Commission and all other city officials involved to reject the proposed expansion and prevent further segregation of our schools.

About the St. Paul NAACP

The St. Paul NAACP is part of a national network of more than 2,400 branches of the NAACP covering all 50 states and the District of Columbia. As the Nation's oldest and largest civil rights organization, the NAACP has more than 500,000 members in the United States and overseas. The mission of the NAACP and its state and local affiliates is to ensure the political, educational, social, and economic equality of all persons, and to protect constitutional rights. The St. Paul NAACP is the local unit of the NAACP comprising members within St. Paul.

Langer, Samantha (CI-StPaul)

From: gita ghei <gitag66@yahoo.com>
Sent: Thursday, December 20, 2018 2:39 PM
To: district10@district10comopark.org; Anderson, Tia (CI-StPaul); Williams, Josh (CI-StPaul)
Subject: St Andrews building

Dear council member and city employees,

I have lived near to the structure named in subject since 2003. The TCGIS seems to have mislead neighbors about their intention to save the structure with their school and now intends to tear it down and build a much larger building. The neighbors who care for preservation have seemingly been undermined. Something should be done from the local government side to ask the school to work with the neighbors to entertain some options for preservation for a certain duration of time and give the preservation idea the time of day. If this doesn't happen and the school is allowed to push their agenda I feel that many neighbors of great standing in our Warrendale will not only feel misrepresented but will be deeply offended. Please make sure the school is required to look at options fairly and with independent voices present who do not have ties with finances or students.

Thank you
Gita Ghei
612-845-8798
1158 Churchill Street

<https://www.instagram.com/stareyeart/>

BOB SPAULDING

1153 Churchill Street ▪ Saint Paul, MN 55103
bob@spauldingklay.com ▪ 612-707-0312

December 19th, 2018

Betsy Reveal
Chair, Saint Paul Planning Commission
c/o 25 West Fourth Street
Suite 1400
Saint Paul, MN 55102

Dear Chair Reveal and Commissioners,

My name is Bob Spaulding, and as some of you know, I served among you until 2013 on the Zoning Committee and Planning Commission. By way of transparency, I also now work for the City of Saint Paul. But I write this letter solely as a resident who lives 350 feet from the proposed Twin Cities German Immersion School (TCGIS) project, and would be substantively impacted by it in many ways. I would not spend this time with this issue if I did not believe the concerns were unusual, pressing, and real.

I will show you these are not “run-of-the-mill” objections to zoning variances. There is something demonstrably and quantifiably different going on here. I don’t believe the balance of evidence falls with the applicant on these variances. But moreover, I will explain my conclusion that there is no rational basis in law to approve the parking variance, and so you must deny it. And I will provide thoughts on next steps.

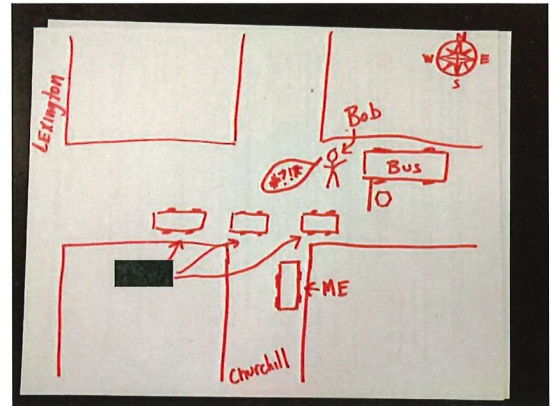
REAL, PERSISTENT, SYSTEMICALLY-ROOTED TRANSPORTATION ISSUES

As a Planning Commissioner, I heard many cases that involved parking and traffic issues. And as a Commissioner, one was left with the sense in some cases these issues are raised up in whole or in part because it is an obvious argument to make about a project using our zoning code, not necessarily because there’s a major issue. I want you to understand: the issues are real. And for unconventional context, I present the sketch on the next page as evidence.

Somewhere between one and two dozen times over the last few years, my wife and I have watched cars on our otherwise quiet corner blow through the outstretched stop sign and flashing lights of our son’s bus, creating a safety hazard. If it happened once or twice, you might argue it was entirely on the drivers. However, the magnitude of incidents and contexts raises this to what is pretty clearly a systemic issue. Other nearby neighbors have struggled with very similar issues in other locations by the school.

So below is a drawing made on September 28, 2017 by a neighbor of mine (who labeled themselves “me” in the drawing) who I did not know and had not met before. We had no inkling the school was going to expand or to tear down the church at the time. What it shows is the safety concern of not one, not two, but three cars in succession driving right through the outstretched, flashing red stop signs and lights of my son’s

bus. Three cars who, it is fair to conclude based on evidence, were most likely there to drop off their kids at the Twin Cities German Immersion School. When I raised concerns on online that night, my neighbor drew this and posted it for context. Contrary to the drawing, I yelled, but did not swear. And while I don't appreciate their behavior, I don't want to use even a moderate pejorative term to describe anyone (which is what is under the black box). Quite the opposite: the point is these are not individual failures as much as there are also real and systemic transportation and safety issues at play – the sort of systemic issues variances and site plan review is designed to address.



SCHOOL NOT RESPONSIVE TO CLEAR AND PRESENT SAFETY ISSUES

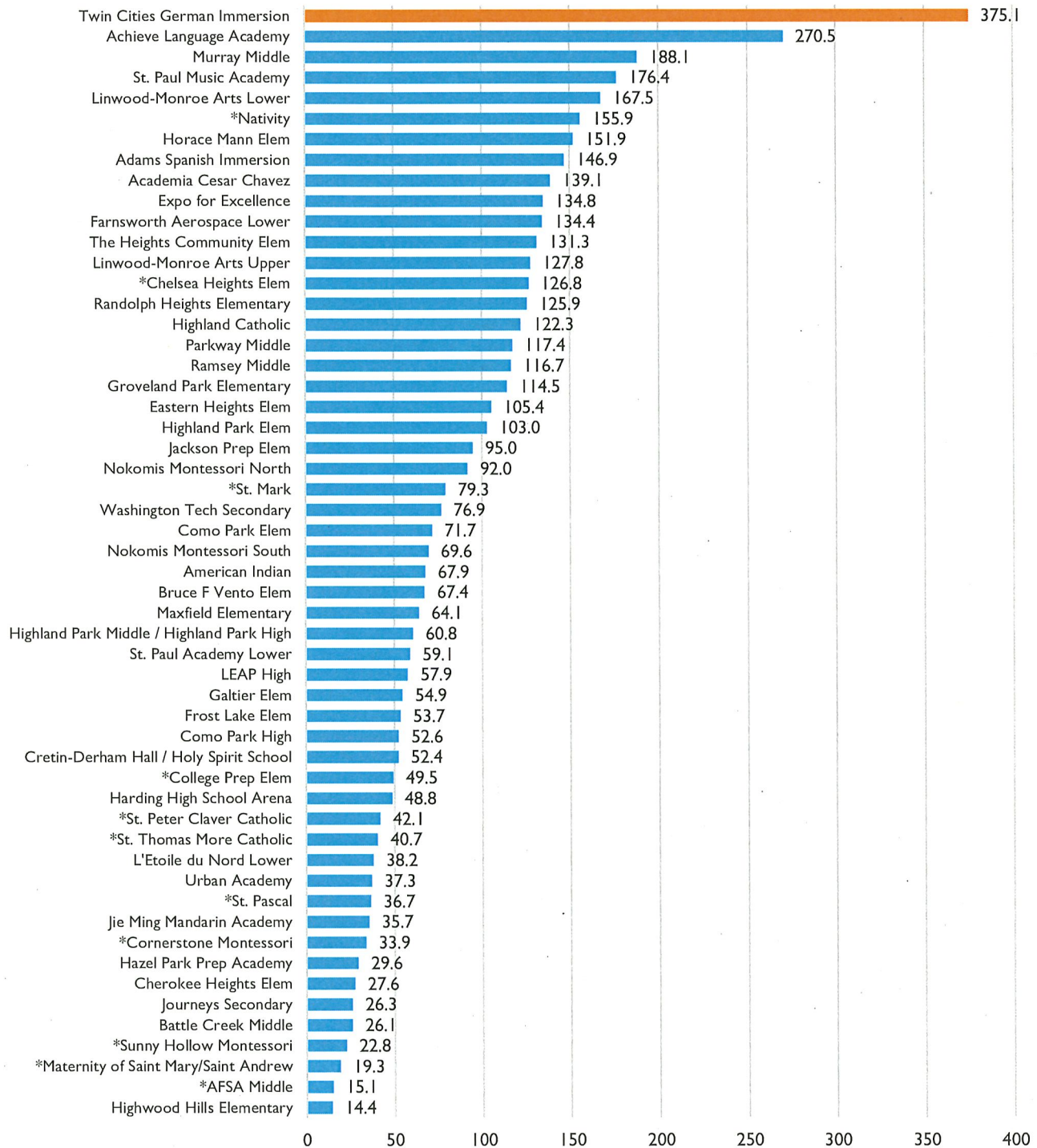
Importantly, these systemic transportation issues have been brought to the school for years. I, not wanting to be the person to raise the neighborhood ruckus, have not been the primary voice. I did raise the issue at a TCGIS Board meeting last spring. The only time I've personally ever seen them take corrective action – occasionally posting staff on the four corners of the block for example – is this year, when they have interest in an active zoning application. Other schools would have long since recognized this is a case for crossing guards at least, and proactive outreach to people just like me. We have been given no reason to trust the school with proactively addressing or correcting the systemic transportation issues of their own creation. To many of us, their late-breaking claims to care about the community ring awfully hollow. To allow them to expand by granting variances given the track record to date seems irresponsible.

INTENSITY OF USE: AN EXTRAORDINARY OUTLIER

Here's a striking fact: comparing elementary and middle schools in the R1 to R4 zoning districts, **TCGIS' proposed school use would have FOUR TIMES the number of students per acre of the median school in R1 to R4 zoning districts in Saint Paul.** See the chart on the next page. Based on data, this school is objectively and quantifiably an extraordinary outlier.

This is why many neighbors are troubled, beyond the issues of historic preservation. **Moreover, most of the schools on this list bus the vast majority of their students. TCGIS is unusual in that it does not,** meaning its transportation system relies on many hundreds of child drop-offs and pickups. Until the last few months, the vast majority of its students were driven to school. We don't have updated data on the mix of driving versus bussed students, but driving still plays a central role in their transportation system. In addition to the fundamental failing of a severe lack of land at the site, the transportation systems are also problematic.

Students per Acre at All Saint Paul Elementary & Middle Schools in R1 to R4 Zoning, if TCGIS Proposal Approved



Analysis based on publicly available datasets: Ramsey County Parcel Geodatabase (2018) & Minnesota Department of Education Enrollment Data (2017-18)
 * indicates parcel also includes church or other non-school use. Chart considers site as strictly parcelized land owned by school or school's landlord.

NO RATIONAL BASIS TO MAKE THE REQUIRED FINDING

On most required findings, I believe the weight of the evidence is not on the school's side. I think many others will give ample evidence there, so I will put my focus in one area. There's one required finding where I submit the evidence doesn't come in shades of gray. To my eyes, it is a pretty fundamentally black and white:

The plight of the landowner is due to circumstances unique to the property and not created by the landowner.

Applied to the parking variance in particular, this is simply not true. Sometimes things move through approval without scrutiny, and if nobody really cares, I suppose that could be deemed okay. This is not one of those times. And if you reread the standard above and apply it to this case, I submit there is simply no rational basis for making this required finding.

First, let's consider what "created by the landowner" would mean. Year after year, the school has **affirmatively decided** to raise its enrollment cap, necessitating the hiring of more staff, requiring more parking spaces under code. The school's affirmative **decision** to raise its enrollment cap is what created the need for the variance. And really that's all there is to the issue. But I'll expand on this to help think through the issue in greater detail.

There's a critical distinction here between a traditional public school system, which must accept pretty much any student who opts to enroll, and a public charter school. Traditional public schools are required to accommodate continual swings in demographics and educational market dynamics. As a public charter school, the decision about how many students to enroll each year is a choice entirely made by TCGIS.

So let's review the evidence TCGIS itself provided to support their conclusion on this finding, and see if it's ultimately about a) "circumstances unique to the property", or b) a decision to get bigger that was "created by the landowner". Remember, if absent the school's decision to get bigger, this would not be an issue, you cannot look me in the eye and tell me they meet this required standard. They simply do not.

- "The owner did not create the limited expansion opportunities needed to address the parking shortage or needed open green space." **Note the reference to "expansion opportunities". Absent the school's own choosing to get bigger on a quantifiably undersized site, this would not be an issue.**
- "Limited parking in a dense urban environment is not unique to this school. It is difficult for schools in an urban area to acquire property sufficient to build a free-standing gymnasium or parking lot. The option to place parking or an addition on their east outdoor turf field would leave them without a playing field. It also poses accessibility, security and maintenance issues being removed from their primary facility. Allowing the turf field to provide the storm water management requirements preserves the student's play area." **The lack of available nearby properties isn't a feature of the specific property that's the subject of this case, and moreover they themselves admit the circumstance is "not unique to this school", so this bullet doubly fails the required finding. Also, absent the school's own choosing to get bigger on a quantifiably undersized site, none of this would be an issue.**

- This nearby community does not have an open lot available, sufficient in size to accommodate the addition, parking and green space. **Note the reference to the “addition”. Absent the school’s own choosing to get bigger on a quantifiably undersized site, this would not be an issue.**
- The size of the addition is based on the programmatic requirements of the school. The addition has been laid out on the site as efficiently as practical and desires to retain outdoor play space. The owner has attempted to acquire several nearby properties for use for additional parking and/or green space. **Let’s be clear about the meaning of language: the programmatic “requirements” of the school were a product of the school’s own decision to get bigger. Absent the school’s own choosing to get bigger on a quantifiably undersized site, this would not be an issue.**

This use, and previous schools like it, have been here decades and had sufficient parking spaces. If you take away the school’s own decision to get bigger – the need for additional parking spaces that is quite directly “created by the landowner”, there is no issue whatsoever. The school’s application for a parking variance fails this finding completely. Notably, the staff report avoids dealing with this factual deficiency entirely, other than to say that the finding “can be met”.

The League of Minnesota cities guidance describes how this standard is to be applied:

The uniqueness generally relates to the physical characteristics of the particular piece of property, that is to the land, and not personal characteristics or preference of the landowner.

As shown, absent the school choosing to get bigger – the preference of the landowner - there would be no issue.

IF THE VARIANCE GETS DENIED, WHAT ARE THE IMPLICATIONS FOR TCGIS?

TCGIS has plenty of fine options even if no such variance ever gets approved for this site. Life will go on:

- TCGIS could temporarily limit enrollment in entering grades to balance out enrollment in a way that fits their existing space, until they are able to settle into a sustainable enrollment pattern better matched to their facilities and the neighborhood.
- TCGIS could slightly increase class size in some grades where they’re right near threshold of deciding between two and three sections, thus requiring fewer classrooms.
- TCGIS could have mixed grade couplets. Instead of having three 5th grade sections and three 6th grade sections, they could better match enrollment to classrooms by having five mixed 5th and 6th grade sections. Teaching professionals tend to look favorably on the benefits of this approach.
- TCGIS could decide to expand to a second site, such as the Central Lutheran School site it explored earlier this year
- TCGIS could utilize a combination of the above approaches to stabilize enrollment on a sustainable path that can be supported by their existing footprint.

Ultimately, it’s not your job to consider this, but I wanted to be clear that denying the variance leaves the status quo in place, which is reasonable. TCGIS will not face a changed reality; they will work in the same context they have for five years, and several schools before have as well.

TCGIS HAS FAILED TO RESPOND TO MN DATA PRACTICE REQUEST IN TIMELY WAY TO MEANINGFULLY INFORM ZONING COMMITTEE DELIBERATIONS

The school routinely claims to have had an intensive consideration of alternatives that led them to a design that tears down a historic landmark eligible for designation, and deepens serious transportation challenges to the surrounding neighborhood. But did they involve local stakeholders that were going to be most impacted by their decisions? As a neighbor 350 feet away, I saw no invitation, and neither did most of my peers. We were floored last spring when the school then suggested they intended to expand yet farther, and tear down the Church of Saint Andrew, which sits at the center of a potential historic district of such great value that the City previously prepared a National Register nomination.

To justify this, they talk about how they investigated several alternatives. But those alternatives were not developed with many nearby stakeholders at the table or even aware of the process. And despite requests, they have not shared the developed plans and associated cost proformas with the public. They have not shared details on their investigations of alternative sites for potential expansion. And so in late November, Friends of Warrendale – Save Historic Saint Andrew's LLC filed a request under the Minnesota Data Practices Act for this information.

The third finding the Planning Commission must make in variance application would benefit significantly from this information. Specifically,

The applicant has established there are practical difficulties in complying with the provision.

As of this writing, that information has not been made available to the public; arguably even if it comes in the next day, that's too late to meaningfully inform this process and the public's interaction with it. This is not goodwill. Most any other accountable taxpayer-funded organization would have made this information available to the public as a matter of course. I invite the Planning Commission to require this information from the applicant if not received in full by Thursday's public hearing.

CONCLUSIONS:

- A CHOICE, NOT A REQUIREMENT, TO EXPAND.
- A SITE THAT'S QUANTIFIABLY TOO SMALL.
- COSTS EXTERNALIZED ON THE SURROUNDING NEIGHBORHOOD.
- NO RATIONAL BASIS ON A REQUIRED FINDING FOR THE VARIANCE.
- LACK OF COLLABORATION ON KEY ISSUES, INCLUDING DATA PRACTICE REQUEST.

TCGIS is trying to put a use in that does not meet the zoning standards we've laid out. The reason that three variances are needed is because TCGIS' proposed use is too intensive for the space. **So to accommodate TCGIS' choice to get bigger on a quantifiably undersized site, the costs of this expansion are being externalized on neighbors.** At peak times around school start and end, we will have more traffic than our neighborhood can bear. For some, parking will be at a premium. Safety for kids who live locally will be diminished. And indeed, we will sacrifice a central historic landmark that has stood for nearly a century at the heart of our neighborhood, one found to be eminently historic.

A BETTER FUTURE... IN THE COMMUNITY COLLABORATIVELY

So what if one or more of the needed zoning variances are denied? I wouldn't leave you hanging, and I think many of you know me to be pretty even-handed. So the denial I'm recommending is on this application, not on the school's total future. But in terms of transportation considerations and historic resources, deep collaboration is needed if the school is to win broad support from the community for anything other than the status quo. You also know that when I served on the Planning Commission, I believed in bringing people together, and I do now as well.

Collaboration is a value I hold dear. Since June, I have been working alongside others in Save Historic Saint Andrews to scope out and put together a collaborative design charrette to uncover alternatives to the most damaging and divisive parts of the school's plans, including those that most conflict with the City's Comprehensive Plan. Several partners, including Historic Saint Paul and Tim Griffin, the former Director of the City-funded Saint Paul Design Center at the Saint Paul Riverfront Corporation, have agreed to pull together such a charrette. Remember, while not all parts of the Comprehensive Plan necessarily come to bear on this case through policy, the project may still effectively be at odds with the Comprehensive Plan. These professionals provide you, the Planning Commission, the extra tools and expertise needed to work through these significant issues.

Tom Fisher, the former Dean of the College of Architecture and Design at the University of Minnesota met with top school leaders and community and concluded there were viable alternatives within the constraints faced by the school. I and many others have said we believe a "win-win" is possible, but that requires the school to actually sit down and collaborate. Three times neighbors, TCGIS parents, Save Historic Saint Andrews and the D10 Community Council have asked TCGIS to collaborate on designs that would specifically address transportation and preservation issues. Three times – in June, in August, and again in November – the school has refused.

You should not be comfortable with a community as deeply divided as this. And this division took shape because TCGIS – a public, taxpayer-funded organization no less – decided to move forward quietly with a plan without deep stakeholder engagement. Now they want to use our tax money on a project that requires three variances, to demolish a building the Heritage Preservation Commission deemed eligible for historic designation, and want city-supported conduit revenue bonds to make it all happen. This project should not go forward.

Thanks for your consideration. I welcome your questions.

Best regards,

Bob Spaulding