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November 20, 2024

City Council Member Johnson
Saint Paul City Hall
15 West Kellogg Boulevard
Saint Paul, MN

Dear Council Member Johnson:

Thank you for your consideration of the rezoning and conditional use permit of 470 White Bear Avenue to support family housing development. We have fulfilled each of our obligations as a developer and are excited to contribute to the City's achievement of its goals as set out in 2040 Comprehensive Plan by creating more affordable and deeply affordable homes for families.

With the public hearing extended to December 4 and presumably a decision on our land use applications by December 11, we will have just enough time to meet our due diligence deadline and move forward with site acquisition according to our latest purchase agreement timeline with the seller. Further delays could negatively impact our ability to assemble and submit applications due in early 2025.

We, therefore, ask that you not extend the timeline further but move swiftly to a decision based on the same criteria that the planning commission used during their unanimous approval.

Below are critical factors relevant to the land use decisions before you and corrections to statements made during the public hearing to help you make your decision.

1. Rezoning and conditional use permit decision

As we noted last week, the rezoning question before the City Council is whether our proposed development, per almost unanimous positive recommendations of your Zoning Committee and Planning Commission, is consistent with the City of Saint Paul's 2040 Comprehensive Plan. We agree with your Committee and Commission that The Aragon, as designed, is consistent with the guidance for the area. In addition, it also advances multiple goals and objectives identified in your Plan, including prioritizing resources to support Saint Paul citizens who face barriers to housing stability, broadening access to housing across income levels, and bringing additional density to key transit corridors, among others.

As to the conditional use permit, we are proud of our track record of stabilizing and transforming lives with successful services that support many of the residents we serve in our portfolio. Across five family properties like The Aragon, our average housing stability a year after residency is over 86%. Among supportive homes at Audubon Crossing, one family has lived there for 14 years, another for four, and exits for other families have consistently been to other stable next-step housing options.

More peripherally, you have heard community residents express concerns about Kimball Court. As we have indicated, the homes at Kimball Court serve far more vulnerable individuals in a different type of housing and service model (Housing First and harm reduction) than what we will offer at the Aragon. Even at Kimball Court, however, where we support far more vulnerable individuals in a neighborhood experiencing a dramatic increase in homelessness and the opioid crisis, 62% of exits from Kimball Court are to other next-step stable housing, and about 77% of residents have achieved one-year housing stability or more.

Your office asked about our experience with first responder calls at comparable family properties in our portfolio. Cranberry Ridge (45 families) and Audubon Crossing (30 families) are predominantly workforce housing properties in Plymouth and Minneapolis, respectively, with services offered to a minority of families. At both, we have fielded about five calls per month unrelated to medical issues affecting residents at the building. This is typical of family buildings of this size.

2. COMMUNITY ENGAGEMENT AND PUBLIC HEARINGS

Beacon has engaged the community beyond the City of St. Paul's stipulations and has held three public hearings for The Aragon's application.

Approval Process and Public Hearings

- Planning Commission, First Round: Our initial rezoning application was made in late June, where we described our plan to include services at the Aragon. The zoning committee approved our application on July 25. After that decision, we received a call the next day from City staff, in which they acknowledged they had missed our statement in our rezoning application that services would be offered and indicated a conditional use permit (CUP) is required when 16 or more residents may receive onsite services. Through discussion with City staff, we agreed that it would be best for us to start the process over again with a new rezoning application alongside the CUP request. The resulting delay cost an additional extension fee per our purchase agreement terms.
- Planning Commission, Second Round: We resubmitted our rezoning application with the conditional use permit application. This started the process over again, and we held a public hearing in October and November.
- City Council: After a unanimous vote in the planning commission, our request received its third public hearing on November 13th in front of the City Council. The City Council votes to extend the public comment period until December 4th.

Community Engagement

Additional engagement activities with your office and the community are outlined below.

- Since April, St. Pascal Baylon Church, as a participating congregation in our Collaborative, has mobilized a team of ten parishioners that has been in dialogue with neighbors nonstop since we announced this project in the spring. They have had at least 140 individual discussions with neighbors about The Aragon.
- May 24 | Our organizer and project manager met with you via Zoom to provide a project overview.
- August 1 | Project launch and information meeting attended by 75 residents, including many nearby neighborhood community members and parish members. This meeting included three ways to gather input and questions (Q & A, a survey of attendees, and breakouts with volunteers and staff).
- August 6 | National Night Out | Staff and volunteers had a table and fielded questions
- August 25 | Initial Zoning Committee, public hearing (with prior 350' neighbor notices)
- October 3 | Second Zoning Committee, public hearing (with prior 350' neighbor notices)
- October 22 | Informational meeting via Zoom about housing development process with St. Pascal Baylon parish members to respond to questions
- November 4 | District Council meeting with area residents with project manager, architect, organizing director
- November 12 | Overview of project, development process, and services to be offered at St Pascal Baylon Church, 30 residents signed in (distributed FAQ, took questions in large group setting, supported additional one-on-one questions at breakouts with staff, architects, and City Public Works staff)

- November 13 | City Council public hearing (extended to December 4)
- December 4 | City Council additional public hearing

In summary, we have consistently followed all directions provided by City staff and requests for additional community engagement even when beyond City legal expectations. As noted above, further delays could negatively impact our ability to assemble and submit applications due in early 2025.

3. WORKING WITH SECO (DISTRICT COUNCIL)

Lastly, we outline below the process that we used to support community feedback, which has exceeded City requirements. At the November 13 City Council meeting, one SECO Land Use Committee member falsely asserted that we had told them that we had engaged the neighborhood when we sought their support at our initial meeting with the District Council (held on June 10). We believe this individual's statement reflects a misremembrance of when and what was said. We review the history below.

- Our initial outreach to the SECO District Council started with an introductory email we sent on March 21 to the address listed on the website. In it, we asked about the process for neighborhood review and an opportunity to address any District Council questions.
- When we did not hear back, we left multiple voicemails in April. In early May, we submitted a message directly to the SECO website.
- On May 24, our organizer succeeded in connecting with SECO President John Slade to talk through our proposal.
- On May 28, we sent an email to Mr. Slade, outlining The Aragon project concept, including our plan to offer onsite services and referrals in partnership with a service provider.
- At Mr. Slade's invitation, we met with the District Council on June 10. At that meeting, Beacon staff and Pope Design architects provided an overview of The Aragon and offered to answer any questions. We did not state that we had engaged the neighborhood in this matter at that time.
- By then, we needed to secure District Council support given the Land Use Committee meeting schedule and because City of St. Paul and St Paul Public Housing funding applications were due July 8 and July 11, respectively. Finding that the proposed project met many of SECO's goals, the Land Use Committee recommended approval. With that recommendation in hand, the SECO District Council voted to approve a support letter for the project, which we received June 25.

SUMMARY

We hope this letter provides important considerations for the land use decisions before you and the City Council. We also hope that this information supports your understanding of the process we have followed to date. At The Aragon, we plan to support families from a wide range of incomes and backgrounds to find high-quality housing with good schools, parks, goods, and services on the East Side – goals we know from your 2040 Comprehensive Plan and other policies of record that we share with the City of Saint Paul.

Please let us know if there are any additional questions that we can help address.

Regards,



Kevin Walker
Vice President, Housing Development

CC: City of Saint Paul City Council