

October 25, 2018

HPC Commissioners,

I write to you today to inform you of the Twin Cities German Immersion School's opposition to the Petition to historically designate the former Church of St. Andrew of St. Paul (the "Property").

The Property is currently owned by Twin Cities German Immersion School Building Company (the "Building Company") and is occupied by the Twin Cities German Immersion School (the "School"), a K-8 public charter school founded in St. Paul in 2005. The School's mission is to support innovative education of the whole child through German immersion, and its values include curiosity, kindness, challenge and support, community, and intercultural engagement.

[TCGIS Position on Historic Designation](#)

The School is a Model for Successful Charter Schools in Both Cities

The School is nothing short of a success story. In providing a unique educational experience that produces superior academic results, the School's enrollment has grown to 580 students, and is projected to level off at 630 students within two years. At that point, the School anticipates enrolling three classes capped at 24 students each, in grades K-8.

After operating out of two prior locations, the School moved to the Property in 2013. At that time, the School converted the Property to an "Aula" -- an open space that is used for gym classes and for performing arts events. The School uses the basement of the Aula as a cafeteria, as a makeshift gym space for our smallest students, and as an additional performing arts space.

The Petition under consideration has been prompted by the School's decision to remove the Property and replace it with a purpose-built structure that is better suited to meeting the 21st century educational needs of its students. **It is important to understand that the School did not come to this decision lightly.**

The School first began analyzing how it could meet its future space needs in February of 2016. Over the ensuing months and years, the School considered numerous options that involved preserving the Aula and building a new facility on adjacent or nearby property.

After determining that these options were not financially feasible, the School informed the community of its plans to remove the Property.

In response to the community's objections, the School revisited these options and also considered acquiring and moving to an entirely different campus, steps that cost the school time, energy and money. Ultimately, however, **the Board determined that it could not in good faith commit the School to the financial risks that any of these options would entail. Thus, as stewards of the School with a paramount obligation to the School's students, the Board decided that the prudent course is to replace the Property with a new building.**

Every Dollar Spent Opposing the Petition or Complying with a Historical Designation is a Dollar Taken Away from Educating Kids

The School opposes the Petition because it will consume scarce resources that are solely intended for education. As a public charter school, the School does not charge tuition, and receives 94% of its funding from the State of Minnesota. And on a per-pupil-unit basis, the receives about 70% of what Saint Paul Public Schools receive for each pupil unit. In other words, it provides excellent academic results while being at a stark funding disadvantage vis-à-vis traditional public schools. That aside, every dollar spent on opposing the Petition, or on complying with historic designation requirements, is a dollar that is taken away from the kids the School is entrusted with educating.

Even a decision to move on the Petition, and to commence the historic designation process, will sap the School's resources. **There are the obvious financial costs associated with obtaining legal representation, and with hiring consultants to review and rebut the assertions made in the Petition, which are substantial. But there are also intangible costs like time and energy. Already, the Petition and the failed engagement leading up to it have consumed vast amounts of staff and Board member time that would otherwise be used to run and improve the School.**

Important initiatives like professional development and support for teachers, enhanced and updated subject-matter curriculum and programming, and teacher onboarding have had to make do with less given the time and energy that this issue has demanded. These costs—tangible and intangible—only stand to increase, and to further sap the school's resources should the Petition move forward.

The Non-Profit School's Future is at Stake if It is to be Forced into Maintaining an Old Building that is Falling Apart and is Functionally Obsolete

Looking further out, there is also the prospect that historic designation could threaten the School's long-term viability. Saddled with the additional costs associated with maintaining the historic appearance and character of a nearly 100-year-old building, and forced to continue operations within a functionally obsolete structure, the School may be unable to meet the needs of its staff and students, leading to increased attrition levels and, with them, decreased enrollment and revenues. Thus, it is not an overstatement to say that the School's future is at stake.

The School also opposes the Petition because the School believes as a matter of principle that historic designation should not occur over the property owner's objections. Especially when the property owner is a non-profit entity such as a public charter school.

It is one thing when a for-profit entity is asked to use some of the profits that it derives from the neighborhood to preserve the historic character of that neighborhood. It is quite another to ask the same thing of a non-profit entity that is not deriving a profit from the neighborhood, but is providing a service to the neighborhood.

Furthermore, historic preservation is not a benefit to non-profit like a school, it is a burden. Thus, any historic preservation over a non-profit property owner's objection should be funded by an assessment on the nearby properties that will derive the benefit from that designation.

The School's singular mission is to provide an outstanding education for children of all backgrounds in the Twin Cities area. Historic designation imperils that mission. Thus, the School strenuously objects to the Petition, and asks that it be denied.

Respectfully submitted,

Ted Anderson
Executive Director