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Peter Musty
Principal Planner and Zoning Administrator
Capital Area Architectural and Planning Board
625 Robert St. N.
Saint Paul, MN 55155

Via Email
peter.musty@state.mn.us

Re: Conditional Use Permit Application – Gallery Office Building – the "Hyphen" Building

Dear Peter:

We represent Dr. Alana Sasaki and Sasaki Medical, LLC d/b/a Kai Shin Clinic ("Kai Shin"), together with West 10th Street LLC. Through West 10th Street LLC, Dr. Sasaki owns the property located at 27 10th Street West (see Attachment A for legal description), also known as the Gallery Office Building or the "Hyphen Building" (the "Property" or the "Building"). Kai Shin plans to revitalize the Building by operating a medical office complemented by a coffee shop cafe on the first floor, and a medical detox facility on the second floor. On behalf of Kai Shin, please accept the enclosed materials as application for a Conditional Use Permit (CUP).

1. Project Description and Overview

Catholic Charities received the Building as a donation and, although it was used for office purposes during the pandemic, the organization no longer needed the space and sold it to West 10th Street LLC in early 2025. The Property is part of a complex that includes three distinct properties, built between 1977 and 1980, located at the following addresses: (1) 26 10th Street; (2) 17 West Exchange; and (3) 505 Wabasha (the "Complex").

- **26 10th Street West** is a 20-story residential condominium complex (the "Residences"), built in conjunction with the St. Paul Housing and Redevelopment Authority (HRA) and occupies the air rights above the Property.
- **17 West Exchange** is a multi-story medical office building ("Gallery Medical"), and
- **505 Wabasha** is home to the Church of Scientology of Minnesota (the "Church")

These three properties, in addition to the Property, share parking owned and operated by the City of St. Paul, as well as a common atrium space that provides accessibility to all sites. The atrium is managed by the Gallery Medical Building, but has not been maintained for several years with the space locked due to public safety concerns.

The Building consists of two floors of medical office space: the First Floor, totaling 13,735 square feet, and the Second Floor, totaling 16,744 square feet. Kai Skin plans to operate both floors, with the First Floor remaining as medical office and a future coffee shop cafe, complemented by a coffee shop. The Second Floor is proposed to be converted into a medical detox facility.

The Property is zoned Mixed Use Downtown District (MXD). The purpose of the MXD zoning district is to maintain the visual relationship to the Capital while promoting a mix of uses that support both the Capital and downtown St. Paul. The Zoning & Design Rules for the Minnesota

State Capitol Area (the "Code") allows a broad range of uses for the Building, including medical clinics, retail, and food sales, such as coffee shops.

Kai Shin's proposed use activates and repurposes vacant space in the Building, providing significant public health benefits for the area. The proposed medical detox facility (the "Facility") will provide stabilization for addiction patients managing their withdrawal symptoms, as well as acute non-emergent medical issues, any chronic issues of the patients while in care, and psychiatric needs. Services provided will include initiation of maintenance medications, administration of medication-assisted treatment, and facilitation of access to substance use disorder treatment based on a comprehensive assessment. The duration of a patient's stay would vary, typically ranging from 24 hours to one week depending on the level of clinical needs. The Facility will offer 24-hour medical supervision, with an interdisciplinary team of nurses, counselors, social workers, addiction specialists, and technical staff under the guidance of a licensed physician. Patients will be discharged to long-term treatment centers, residential facilities, sober homes, or may return home, based on their level of care. No residential treatment is proposed for the Property. The Facility will serve exclusively patients under medical supervision.

2. Proposed Detox Center Structure

Historically, the Second Floor has been used for multiple medical clinics with independent physician offices. The access easement passed through these units without interfering with access to the clinics, as all clinics had independent entrances and did not share facilities. For the proposed Facility, the Site Plan set submitted with our application illustrates the building orientation plan, existing space, and the proposed second floor suite buildout. Separate dining, bathroom, and dormitory facilities are provided for men and women receiving care. The Site Plan set illustrates the office space for staff and recreational space for patients requiring stays longer than 72 hours (under medically managed care). Our application also includes a Gallery Office Building site overview to provide context within the St. Paul downtown area. The Facility will comply with all relevant zoning and building code regulations, ensuring safety and accessibility for all patients and staff.

3. Conditional Use Permit

Given the high level of medical care provided and the nature of the proposed use, we believe the Facility is appropriately characterized as a "hospital" under the Code, which requires a conditional use permit (CUP) within the MXD. Thus Kai Shin is seeking a CUP for its proposed use of the second floor of the Building as a medical detox facility. The proposed use meets the required findings under the CAAPB Administrative Rules part 2400.3155, subpart 1 for issuance of a CUP, as follows:

1. The use will not materially adversely affect the general character of existing principal uses;

We recognize that the Property works in tandem with other owners, including the owner of the Gallery Medical Building, the Church and the residential tower tenants. A critical aspect of development and build out of the Facility includes managing the access easement that allows residential owners and tenants access to the residential building elevator from the skyway level. Dr. Sasaki's proposal to repurpose the second floor for detox services necessitates coordination with residential tenants and must ensure that the proposed use will not materially adversely affect the general character of the residential use.

The services Kai Shin will provide include intensive medical supervision for patients experiencing withdrawal symptoms. As a result, patients are not permitted to come and go from the Facility freely, as the proposed use does not include residential treatment options. This fact will ensure the general character of existing principal uses in the surrounding area are not adversely affected. In addition, Kai Shin anticipates a positive community impact from the Facility, that will positively impact existing principal uses:

- **Addressing Public Health Needs:** The Facility will provide essential services to individuals struggling with substance abuse, thereby improving overall community health.

- **Reducing Crime Rates:** By offering treatment options for those struggling with substance abuse, the Facility aims to reduce substance-related crimes in the area. Providing care to those struggling with substance abuse will provide short term and long term benefits to the general character of the existing residential use.

- **Creating Employment Opportunities:** The Facility will create jobs for healthcare professionals and support staff, contributing to the local economy.

Based on the location of the Property, Kai Shin views this as a unique opportunity to provide expanded detox services within the central business district, while also providing a high level of clinical care and a place for the community to gather. Critical to note is that with the closure of Ramsey County Detox Center, there is no detox center in downtown St. Paul or the surrounding area. Furthermore, Kai Shin has established relationships with local care providers through Dr. Sasaki's previous leadership role in Mercy Hospital's addiction medicine program. This collaboration can help local hospitals and healthcare networks meet the growing demand for addiction treatment services in the area. As such, the Facility is designed to blend into the general character of existing principal uses, while mitigating any perceived negative effects.

2. The use will not adversely affect the beauty, dignity, and architectural integrity of the Capital area; and

No exterior changes are proposed to the Building, and thus, the use will not impact the beauty or architectural integrity of the Capital area on its exterior. The Site Plan proposes interior improvements and upgrades that will revitalize and activate vacant space to provide expanded detox services to meet a public health need on the second floor, while also creating a place for the community to gather on the first floor. Moreover, the dignity of the Capital area will be improved through the expanded provision of detox services designed to get those struggling off the streets and into managed care provided by professionals.

3. The use will be established under the conditions and requirements for the uses enumerated in this chapter and additional conditions and requirements as the Board may impose to ensure compliance with items [1 and 2].

The Facility will be established under the conditions and requirements for conditional uses, and Kai Shin is committed to ensuring that the Facility aligns with local planning goals and addresses any issues that may arise during the approval process. In fact, to ensure our use aligns with the goals of downtown St. Paul and the Capitol area, we have met with representatives of the St. Paul Port Authority and the City of St. Paul Planning Department to discuss the Property, proposed uses, and the future of the area. Kai Shin is a committed partner to ensuring it not only complements the general character of existing principal uses, but is a partner in supporting downtown and Capital area investment and community.

Moreover, while there are no specific parking requirements, Kai Shin is looking ahead to address any parking needs. Kai Shin has engaged with the City Planning and Economic Development Parking Manager regarding Municipal Ramp 7A, the underground parking that provides direct access to the second floor of the Property. The Property currently has two on-site parking spots and we are in the process of determining the additional parking needs and type of contract to secure for Municipal Ramp 7A.

4. Community Engagement

Although not explicitly required by the CAAPB's review and application procedures, Kai Shin is committed to engaging with the community to explain anticipated public benefits and better understand any perceived negative effects or concerns. In recognition of the importance of input, Kai Shin aims to ensure that the concerns and suggestions of neighboring property owners, local businesses, community leaders, and residents are considered and addressed earnestly.

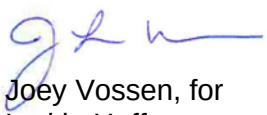
Kai Shin is currently engaged with representatives from the Fitzgerald Neighborhood reviewing the use, discussing any concerns for the surrounding area, and complementing investments. Kai Shin plans to continue to partner with Fitzgerald Neighborhood on safety concerns and will be attending the next neighborhood meeting. As a part the connections to the Fitzgerald Neighborhood, Kai Shin is also in communication with the Church discussing safety and clean-up on the block and complementing uses.

Feedback and connection will continue through the project and after as we are introducing ourselves to the new owner of Gallery Medical and different representatives from the residential condominiums. Kai Shin will notify and solicit feedback from Saint Paul City Council President Rebecca Noecker as part of the overall community engagement process. Council Member Noecker is the representative of Ward 2, including the Downtown Neighborhood. Additional efforts will be made to notify and solicit feedback from other community stakeholders, such as the Church of the Assumption, Fairview Health Wellness Hub, and Catholic Charities.

Conclusion

Kai Shin is a community investment, actively working with the City and its neighbors to provide a critical need and connection throughout the surrounding area. We respectfully request approval of this CUP application for the proposed use. Thank you for your consideration of this application. Please feel free to contact me with any questions or requests for additional information.

Sincerely,



Joey Vossen, for
Larkin Hoffman

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cc: Dr. Alana Sasaki

Enclosures: Application and Site Plan

Exhibit A

Legal Description of the Property

Unit No. 1 and 2, Condominium No. 123, Gallery Commercial Condominium, Ramsey County, Minnesota.

4936-5800-3125, v. 2