



## Capitol Area Architectural and Planning Board

Freeman Building  
625 Robert Street North  
Saint Paul, MN 55155  
651-757-1500  
<https://mn.gov/caapb/>

Date: **Updated May 23, 2025**  
To: Capitol Area Architectural and Planning Board members  
From: Peter Musty, Principal Planner and Administrator of Zoning & Design Rules (CAAPB)  
Erik Cedarleaf Dahl, Executive Secretary (CAAPB)  
RE: **AGENDA ITEM #2 - 615 Park Street: New Community Residential Facility (Reuse of Existing Vacant House)**



*Photo from Google Earth of existing vacant house at 615 Park Street from Park Street and Winter Street (looking southwestward)*

### **For Board Consideration: Approval of Conditional Use Permit and Variance**

**The applicant is asking for required Conditional Use Permit and Variance (necessary due to a sub-standard corner lot size) to allow for investment repurposing a vacant three-story house as a community living facility serving up to six adults in five guestrooms.**

## CONTENTS (**NEW** information since March 2025 memo is noted)

- Summary of Community Residential Facility
  - Site and Building Information
  - Summary of Conditional Use Permit Request and Variance Request
- 
- **NEW**: Agenda (Item #2) for upcoming Board Meeting
  - **NEW**: FAQ: What is an IRTS? What is the St. Paul Capitol Area IRTS Facility?
  - **NEW**: Community Informational Sessions and Discussions in April and May
- 
- Staff Review and Findings: Criteria Met (CUP and Variance)
  - Suggested Board Language
    - **NEW**: Added Conditions – May 2025 (proposed by Applicant)
  - Staff Evaluation of Criteria for Conditional Use Permit and Variance
- 

## ATTACHMENTS:

- A. Variance Notice (Lot Size)
- B. **NEW**: Facility Summary FAQ – May 2025 (one page PDF)
- C. **NEW**: Overview of Intensive Residential Treatment Services (IRTS) Facilities – April 2025 - link: <https://youtu.be/67YfbP9poQM> (attached is PDF of PowerPoint)

## Summary of Proposed Community Residential Facility

The proposed facility, Saint Paul Capital Area IRTS Facility, is designed to serve individuals experiencing mental health challenges, particularly focusing on marginalized communities within Ramsey County. This facility will provide intensive residential treatment services, including therapeutic interventions, support with daily living activities, and 24-hour supervision in a structured, supportive environment. The primary use of the property will be as an Intensive Residential Treatment Services (IRTS) program, consistent with the Minnesota Department of Human Services' guidelines. The facility will accommodate a maximum of six residents.

## Site and Building Information

Owner/applicant:	Bibi Abdalla
Address:	615 Park Street, Saint Paul, MN 55115
Lot Size:	0.11 acres (~5,000 SF) – corner lot with side loaded access to garage off Winter
Zoning District:	RM Moderate Density Residential
Building status:	vacant
Current Use:	expired, no authority to continue use without zoning permit
Proposed Uses:	<b>‘Community residential facility, licensed human service’</b>
Program:	Intensive Residential Treatment Services (IRTS) <a href="#">Mental Health Services - Intensive Residential Treatment Services (IRTS)</a>
CUP necessary?	yes - conditional use permit (CUP) has been requested by applicant
Variance necessary?	yes – one variance to allow for viable number bedrooms on substandard (below average) lot
Guest Rooms:	3 (three) mid-size to larger bedrooms w/ shared living
CUP Approval:	up to 6 (six) resident persons
Occupancy (max):	up to 5 (five) residents until sprinkler system installed (per City of Saint Paul)

## Summary of Conditional Use Permit Request and Variance Request

The proposed living facility parcel is located in the Moderate Density Residential (RM) zoning district of the Capitol Area as shown in *The Zoning and Design Rules for the Minnesota State Capitol Area* found at [www.mn.gov/caapb](http://www.mn.gov/caapb).

The proposed use is entitled per **Section 2400.2205 Table of permitted and conditional uses by district** under *.../Congregate Living/‘community residential facility, licensed human service’* and will require a Conditional Use Permit. (See Rules pages 18-21).

The variance requested is to the zoning regulation in **Rules 2400.2715 Standards for congregate living uses. ...part B. (3).** “...B. For community residential facilities licensed by the Department of Human Services, ... for 12 or fewer persons, ... (3) a minimum lot area of 5,000 square feet must be provided for the first two guest rooms and 1,000 square feet for each additional guest room: ...” The parcel is a

corner lot of approximately 5,000 square feet, which is smaller than average nearby and within the Capitol Area. The facility proposes a maximum of six guests living in five guest rooms with shared living areas. No variance is required to allow two guest rooms, but the three additional guest rooms will require a variance to the 8,000 square feet required minimum lot size (required for five guest rooms without a variance). (See Rules pages page 51-52).

The proposed facility is gaining appropriate licensing from the State, County, and City. The applicant must upgrade the existing structure to meet all health, safety, access, and occupancy codes. No structural change is proposed to the envelope of the building or to the site. With no exterior improvements beyond aesthetic and maintenance upgrades, only operational conditions agreed to by applicant have been included in suggested board language (with no conditions **related to needed property changes**) have been identified by staff as being necessary, and the building otherwise complies to standards within the RM zoning district, including compliance to standards for parking.



### **NEW: Agenda (Item #2) for upcoming Board Meeting (~10-15 minutes)**

Staff is proposing time to bring Board Members update and some new information:

- Brief Overview and Summary of Recommended Action (Staff)
- Presentation from Applicant Bibi Abdalla
  - IRTS Overview
  - St. Paul Capitol Area IRTS Facility Overview
- Statement from Board Member Hannah Hills (Mayoral Appointee), Capitol Heights Block Club
- Board Member Discussion and Questions of Staff and Attending Resources:
  - Bibi Abdalla (Applicant)
  - Invited: Future Facility Team Expertise (Nurse, Therapist) St Paul Capitol Area IRTS
  - Erin Ruiz, Department of Human Services



## **NEW: FAQ: What is the St. Paul Capitol Area IRTS Facility?**

*The following information provided by applicant / facility owner Bibi Abdalla - updated May 22, 2025.*

### **What is an Intensive Residential Treatment Services (IRTS) Facility?**

An IRTS facility provides a safe and supportive environment for individuals with severe mental illness who need more support than outpatient care but do not require hospitalization.

### **What is the St. Paul Capitol Area IRTS Program?**

Our program offers comprehensive, culturally competent mental health services designed for adults aged 18 and older, focusing on individuals from marginalized communities.

### **What types of services will be offered?**

- **Mental Health Care:** Psychiatric evaluations, medication management, individual, group, and family therapy.
- **Substance Use Counseling:** Support for co-occurring substance use disorders.
- **Life Skills & Vocational Training:** Daily living skills, job readiness, and educational support.
- **Holistic Wellness:** Nutritional counseling, physical health programs, and creative therapies.
- **Transitional Planning & Aftercare:** Discharge planning and post-discharge support to ensure long-term success.

### **Who will the facility serve? How many can be served?**

We primarily serve adults from underserved populations, including those who have experienced trauma, homelessness, or frequent psychiatric hospitalizations. Six residents will be approved as the facility maximum, however currently no more than five residents can be served at this facility due to building code.

### **Are there licensed professionals on-site? What are the facility licenses to be maintained?**

Yes, our facility will be staffed, 24/7, with a highly trained, multidisciplinary team dedicated to providing exceptional care.

#### **Licensed Staff:**

- Psychiatrists & Psychiatric Nurse Practitioners [off site – by appointment]
- Licensed Mental Health Therapists [Mental health professionals]
- Registered Nurses for medication management
- Substance Use Counselor

#### **Facility Licenses:**

- The facility will hold IRTS a state license to ensure we meets standard care and safety for clients.
- There will also be facility licenses and inspections to ensure facility maintains occupancy permit and health inspections

### **How is safety ensured for vulnerable populations and our community supporting them?**

- **24/7 Staffing and Crisis Support:** Ensures safety for both clients and the neighborhood.
- **Regular Inspections and Background Checks:** All staff undergo rigorous background checks, and the facility is regularly inspected by the Department of Human Services (DHS).
- **Strict Visitor Policies:** Controlled visitor access to maintain a secure environment.

- **Small Facility:** Only 5 (max 6) clients at a time to ensure individualized attention and minimal neighborhood impact.

#### **What are the community benefits?**

- **Enhanced Safety and Support:** By providing a structured, supportive environment, we ensure that vulnerable individuals receive the professional care they need. This promotes stability, recovery, and successful reintegration, ultimately benefiting the entire community's well-being.
- **Holistic Care:** Promotes recovery, independent living, and community reintegration.
- **Culturally Competent Services:** Addresses the unique needs of diverse populations, making our community stronger and more inclusive.

### **NEW: Community Informational Sessions and Discussions in April and May**

#### **IRTS Informational Sessions with Department of Human Services – April 21st and 23rd**

At the March Board meeting, a request of the Board (suggestion of Board Chair) was that time should be taken before Board action to provide more information to Board and community members on DHS licensed Intensive Residential Treatments Services (IRTS) facilities. In April, CAAPB staff and Department of Human Services (DHS) held three informational overviews on IRTS community living facilities for Board members and community members of the CAAPB area.

Board Members that did not attend can watch recording of the IRTS overview provided by DHS Erin Ruiz: <https://youtu.be/67YfbP9poQM> and/or may find a pdf of the presentation attached to this memo. Please reach out to CAAPB staff if you have any questions. Special thanks to DHS for their help.

#### **Community Informational Session (on St Paul Capitol Area IRTS Facility) provided by Applicant/Owner Bibi Abdalla – May 15<sup>th</sup>**

The applicant came forward to offer a one-hour informational session with community members. Five community members attended and met with Ms. Abdallah's team, her business partner and a nurse that may be employed at the facility. The information they shared is summarized in the FAQ summary in this memo. More in depth facility information that was presented at the session can be obtained through request of applicant via staff.

## Staff Review and Findings: Criteria Met (CUP and Variance)

**December 2024: Variance Request Complete.** After discussions with applicant, revisions by applicant were made, and the Variance Form-V submittal was deemed complete by CAAPB Zoning Administrator.

**January 2024: Public Notice of Variance and Description of Proposed Variance:** See attached *Public Notice of Variance*. The notice was sent as required, via regular mail, to all property owners and occupants within 350 ft of the zoning lot (outer property lines) of the project. The variance notice included a summary of the variance request and a summary for the project, and applicant arguments were offered on request.

**By March 24, 2025, Board Meeting: The 30 Day (Minimum) Period for Public Written Comment Passed:** The comment period remains open until Board action is considered on this item. As of the writing of this memo, CAAPB has not received any written comment related to this variance request, and it's notable that few questions or concerns have been raised informally from commercial neighbors, community members, or residents during meetings conducted or conversations offered and attended by applicant and staff.

The March Board meeting serves as the official close of the written comment period. Residents and businesses, previously notified through community meeting and variance notice, wishing to speak to the matter have been invited to do so as part of the comment period – be it verbally or in writing. \*

*\* CAAPB Staff will immediately advise Board Chair in advance of the meeting should a community member come forward ahead of the meeting and wish to speak to the variance issue, and staff will make accommodation for that community member to be present in-person or dialed in to the Teams Meeting. Further, should correspondence be received regarding the proposed variance, staff will furnish that correspondence ahead of the Board Meeting as an addendum to this memo.*

The Zoning Administrator has requested that the applicant be present at the March 24<sup>th</sup> Board meeting in case the Board Chair wishes to invite the applicant to speak about the project or to answer questions from Board Members.

**The granting of the Conditional Use Permit is supported by CAAPB staff.** The applicant has filed arguments in support of the proposed variance. As summarized below, staff finds that all criteria for granting of CUP have all been met.

**The granting of the lot size Variance is supported by CAAPB staff.** The applicant has filed arguments in support of the proposed variance. As summarized below, staff finds that all criteria for granting of variance have all been met.

---

## Suggested Board Language

“The Capitol Area Architectural and Planning Board (CAAPB) approves the granting of permitting by the Zoning Administrator of the Capitol Area Architectural and Planning Board to Bibi Abdalla which will include:

- Granting of Conditional Use Permit (CUP) **allowing for ‘Community residential facility, licensed human service’** as requested in the March 24<sup>th</sup> Board memo and the applicant’s referenced submittal.\*
- Variance to the Rules Governing Zoning and Design for the Minnesota State Capitol Area, Rule 2400.2715 Standards for congregate living uses. B. (3), **allowing five guest rooms**, as described in the Variance Notice published January 2025, as outlined in Board memo dated March 24, 2025, and the applicant’s referenced submittal.

This approval of Conditional Use Permit and Variance does not constitute a rezoning of the property, is valid only for the project proposed by this zoning application and is not transferable to subsequent proposals or permit applications for this or any other property in the Capitol Area.”

---

### **NEW:**

“ \* Further, the following conditions are applied to the approved CUP by the Board:

1. The board recognizes and records the following clarification: that the maximum allowed by Conditional Use Permit is 6 (six) residents living in 3 (three) bedrooms of varying sizes, but the maximum allowed by building code is 5 (five) residents until a sprinkler system is installed, after which an additional bedroom and/or resident may be added to reach the maximum of six persons allowed by CUP.
  2. The board recognizes offer for applicant to maintain an informational online presence with contact information for on-site staff of the facility.
  3. The board accepts the offer for the applicant to attend meetings proposed by CAAPB staff if and when necessary to address issues related to the property and compliance with Capitol Area permitting.”
-



## Staff Evaluation of Criteria for Conditional Use Permit and Variance

### Criteria for a Conditional Use Permit:

Requests for Conditional Use Permits are reviewed in accordance with Minnesota Rule 2400.3155

Subpart 1. Conditional use application, by which *"A conditional use is permitted upon a finding by the board that the use is specifically enumerated as a conditional use for the district as that, if established, the use ..."*

- A. **will not materially adversely affect the general character of existing principal uses;**
  - ✓ This criterion is met. Provision of housing and the diversification of housing choices in the Capitol Area is both an organizing principle in the Comprehensive Plan but is a primary intent of the RM zoning district.
- B. **will not adversely affect the beauty, dignity, and architectural integrity of the Capitol area;**
  - ✓ This criterion is met. The built form and character of the site is not changing.
- C. **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 A and B.**
  - ✓ This criterion is met. Compliance with the Rules has otherwise been met, with exception of the variance request under consideration, and staff is not recommending additional conditions be stipulated by the board.

### Criteria for a Variance:

Variance requests are reviewed in accordance with Minnesota Rule 2400.3160 Subpart 3. Subp. 3.

Standards for review of variance requests, by which *"The board may grant a variance to the application of any of its rules, except for its design standards and sign rules, only if it determines that all of the following criteria have been met: ..."*

- A. **...the property in question cannot be put to a reasonable use\* under the strict application of the rules;**
  - ✓ This criterion is met as the proposed use of the property is found to be reasonable. The structure has been vacant and deteriorating for lack of investment by the private sector. The strict application of the rules would prevent success of the small business model of the applicant who is proposing to establish housing choices for a vulnerable population in the Capitol Area. Without new investment, the property would continue to deteriorate.

*\* Regarding 'reasonable use': variance law has changed since publication of CAAPB Rules in 2009, and the way our Criteria A can be evaluated has expanded to simply require reasonableness. From League of Minnesota Cities website (<https://www.lmc.org/resources/land-use-variances/>) regarding 'Reasonableness':*

- *"The first factor is that the property owner proposes to use the property in a reasonable manner.*
- *This factor means that the landowner would like to use the property in a particular reasonable way but cannot do so under the rules of the ordinance.*
- *It does not mean that the land cannot be put to any reasonable use whatsoever without the variance. For example, if the variance application is for a building too close to a lot line or does not meet the required setback, the focus of the first factor is whether the request to place a building there is reasonable."*

**B. ...the plight of the landowner is due to circumstances unique to the property, and the circumstances were not created by the landowner;**

- ✓ This criterion is met. The below average lot size creates a circumstance where the structure is acceptably sized, but the overall lot does not meet the metric of the Rules. When measured, the average lot size nearby is 150%-200% larger than this lot with similar structures.

**C. ...the proposed variance is in keeping with the spirit and intent of... [*The Zoning and Design Rules for the Minnesota State Capitol Area, 2009*] ...and is consistent with the health, safety, comfort, morals, and welfare of the inhabitants of the Capitol area and the City of St Paul;**

- ✓ This criterion is met. New community living facilities licensed by the Department of Human Services is encouraged in residential settings such as this. The intent of the RM zoning district calls for provision of housing. The Comprehensive Plan is organized around the diversification of housing choices. This is a precedented and viable manner to provide housing for this population in the Capitol Area. The guest rooms proposed reuses the current structure as it is configured, this is NOT an intensification of housing nor an introduction of activity that will negatively impact current inhabitants of the neighborhood.

**D. ...the proposed variance does not impair an adequate supply of light and air to adjacent property, nor does it alter the essential character of the surrounding area or unreasonably diminish established property values within the surrounding area;**

- ✓ Staff evaluation: This criterion is met. The new facility will invest in the current built form and preserve the supply of light and air to adjacent properties and to Park and Winter Streets.

**E. ...the variance request, if granted, does not permit any use that is not permitted under the Rules for the property in the district where the affected land is located, nor does it alter or change the zoning district classification of the property;**

- ✓ This criterion is met. The zoning for the property allows for community living facilities.

**F. ...the request for variance is not based solely on the design to increase the value or income potential of the land parcel.**

- ✓ This criterion is met. No, in the evaluation of staff, the primary goal of the applicant is to provide needed housing in the community.