

FERDINAND F. PETERS, ESQ. LAW FIRM
Lakes & Plains Office Building
842 Raymond Avenue, Suite 200
St. Paul, Minnesota 55114
Phone: (651) 647-6250 Fax: (651) 251-1183
ferdpeters@ferdlaw.com

RECEIVED
OCT 05 2016
CITY CLERK

October 4, 2016

St. Paul City Council
Ms. Shari Moore, City Clerk
15 Kellogg Blvd. West
310 City Hall
St. Paul, MN 55102
Fax: 651-266-8574
Shari.moore@ci.stpaul.mn.us

VIA EMAIL, U.S. MAIL AND FACSIMILE

Subject: Objection to 2016 ROW Assessment
Property Addresses: 1728 Hague Avenue, St. Paul, MN 55104 and
1703 Laurel Avenue, and 1708 Portland Avenue, St. Paul, MN 55104

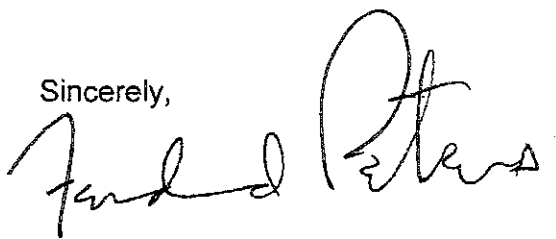
Dear Sir or Madam:

I own the buildings located at 1728 Hague Avenue and 1703 Laurel Avenue and 1708 Portland Avenue, all in St. Paul, MN. The first two of the above-referenced properties are located on corner lots, which result in much higher ROW Assessments because two sides of each property abut residential streets, which I object to. Each side of these two properties abuts a street which is charged the residential street rate of \$7.34 per lineal foot. The 2016 Right-of-Way Assessments ("ROW Assessments") for these properties are \$1,130.36 for 1728 Hague Avenue and \$1,137.70 for 1703 Laurel Avenue and \$186.40 for 1708 Portland Avenue. As for the first two properties, other similarly sized, similarly located properties in St. Paul that situate in the middle of a block are charged only for the residential street amount for the front side of the property.

I object to all of the 2016 ROW Assessments for the above-referenced properties because the assessments are not based upon the benefits conferred to the properties as required by Minnesota Statute section 429.051 and because it violates the Minnesota Constitution and the U.S. Constitution, and also violates the recent Minnesota Supreme Court Case of First Baptist Church of St. Paul, et al., vs. City of St. Paul (A15-0015). Each of the first two above-referenced properties does not receive a greater benefit from the ROW Assessment because two sides of each property are assessed versus one front side. Additionally, I object to the ROW Assessments because the assessment structure is not proportional or uniform. And finally, not only does the proposed ROW assessment amount exceed any possible benefit conferred, it is also objected to since absolutely no benefit is conferred.

St. Paul City Council
October 4, 2016
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Ferdinand F. Peters". The signature is written in a cursive style with a large, prominent initial "F".

Ferdinand F. Peters