

**From:** [Marjorie Abrams](#)  
**To:** [CouncilHearing \(CI-StPaul\)](#)  
**Subject:** DID  
**Date:** Thursday, July 11, 2024 7:50:20 AM

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I cannot attend the hearing, unfortunately.

Please enact this proposal to expand the DID. I live in Lowertown at 8th and Wacouta.

I and my neighbors are constantly picking up trash, needles, and calling police for bad behavior in our neighborhood.

Our neighborhood is a corridor to the listening house and their hours are not covering the need. The events at CHS and Mears consistently increase trash and destructive activities in Wacouta Commons Park and along the street and sidewalks.

Kids after school that are unsupervised, tear up the gardens and trash the playground and streets.

Help is mostly unavailable from police and parks and recreation. It's getting less tolerable and many have express interest in moving or have already moved away.

The cost for the DID is minimal for the service and a bargain, in my opinion.

Whether or not these services should already be provided with our taxes, the need remains and I want relief, cameras, enforcement...

Marjorie Abrams

**From:** [John Gaglione](#)  
**To:** [\\*CI-StPaul>Contact-Council](#); [CouncilHearing \(CI-StPaul\)](#)  
**Subject:** St Paul - Special Service District Service Charge  
**Date:** Thursday, July 11, 2024 9:49:32 AM

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Hello - I am a resident of Riverpark Lofts - 406 Wacouta St. St. Paul.

I am not in favor of the Special Service District and related service charge.

The basic services the 'new entity' is proposing should be provided by the existing St. Paul infrastructure/government. Clean and safe streets are not unusual requests and should be provided by the city.

The creation of a new quasi-government entity simply allows Mayor Carter and existing city government bureaucracy to shirk its responsibilities.

Thank you - John Gaglione

**From:** [Kelly Hadac](#)  
**To:** [info@spdid.org](mailto:info@spdid.org); [\\*CI-StPaul Contact-Council](#); [CouncilHearing \(CI-StPaul\)](#)  
**Subject:** Objections to Establishment of Comprehensive Downtown Improvement Special Service District (Public Hearing July 17, 2024; Line Item 11; Ord 24-17)  
**Date:** Thursday, July 11, 2024 4:06:03 PM  
**Attachments:** [Letter dated July 10, 2024 Objecting to Proposed Special Service District.pdf](#)

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Dear City Council:

Attached please find objections to the establishment of a Comprehensive Downtown Improvement Special Service District. Please place this on the meeting agenda.

Thank you.

Kelly Hadac, Esq.  
Hadac Law Office PLLC  
[khadac@yahoo.com](mailto:khadac@yahoo.com)  
(651) 895-6633

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# HADAC LAW OFFICE PLLC

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Via Email to [info@spdidd.org](mailto:info@spdidd.org); [Contact-Council@ci.stpaul.mn.us](mailto:Contact-Council@ci.stpaul.mn.us);  
[CouncilHearing@ci.stpaul.mn.us](mailto:CouncilHearing@ci.stpaul.mn.us);

July 10, 2024

Saint Paul Downtown Improvement District  
401 North Robert Street, Suite 150  
Saint Paul, MN 55101

St. Paul City Council  
15 Kellogg Blvd West  
310 City Hall  
Saint Paul, MN 55102

RE: Objections to Establishment of Comprehensive Downtown Improvement  
Special Service District (Public Hearing scheduled for July 17, 2024)

Dear St. Paul Downtown Improvement District and St. Paul City Council:

I am legal counsel for a significant number of downtown property owners who own properties that are located in the newly proposed downtown improvement special service district ("Proposed SSD"). My clients include:

- Upper Corner Venture II LLC (270 7<sup>th</sup> Street East);
- Upper Corner Venture II LLC (266 7<sup>th</sup> Street East);
- Just Do It LLC (249 7<sup>th</sup> Street East);
- Just Do It LLC (245 7<sup>th</sup> Street East);
- Alliance Center, LLC (56 6<sup>th</sup> Street East);
- Alliance Center, LLC (55 5<sup>th</sup> Street East);
- Alliance Center, LLC (6<sup>th</sup> Street East, Unit 1);
- Degree of Honor Building LLC (325 Cedar Street);
- 375 Jackson Courtly LLC and 375 Jackson Willow LLC (375 Jackson Street);

- 375 Jackson Courtly LLC and 375 Jackson Willow LLC (135 5<sup>th</sup> Street East);
- Empire Building LLC (360 Robert Street North);
- Park Square Court Building LLC (400 Sibley Street);
- Railroader Bryan LLC and RK Railroader LLC (229 6<sup>th</sup> Street E);
- Stadium Ramp LLC (245 6<sup>th</sup> Street E); and
- US Bank Center LLC (101 5<sup>th</sup> Street E).

The above property owners are collectively referred to as the “Property Owners” for the remainder of this letter where appropriate.

This letter is a formal objection by the Property Owners to the Proposed SSD. Although the Property Owners are very concerned about the security and cleanliness issues on the streets and skyways of St. Paul, there are a number of reasons for the objection and for the City Council to reject the Proposed SSD. Some of these reasons are listed below.

### **State of Downtown**

Downtown St. Paul is in trouble. Crime is up. Bullet holes in the glass on the commercial buildings and elsewhere is no longer uncommon. There is rampant homelessness and drug use. Restaurants have gone out of business. Businesses have gone bankrupt. Large buildings are vacant. Operating businesses are fleeing to the suburbs. Skyways are empty. Public and private employees are working from home. I could go on and on but we trust that you understand the point.

There are many examples that demonstrate the crisis that St. Paul currently faces. First, the U.S. Department of Veterans Affairs recently vacated its space in the US Bank Building due to the volume of crime that existed outside of its leased space near the central station. Second, despite having offices in St. Paul for over 100 years, TKDA is fleeing St. Paul to go to the suburbs. Third, Lunds & Byerlys has announced reduced hours which is most likely a reflection of the crime that continues in St. Paul and the failure of people returning to work in downtown St.

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Paul. Again, these examples are just a few of many that could be listed in this letter.

In light of the very evident crisis, this is not a time to increase the financial demands upon the owners of real property in downtown St. Paul. These owners already pay overstated property tax bills because Ramsey County has not reduced the values of the buildings to reflect market value. The owners are also paying increased costs for utilities and the like. Adding another financial mandate will be detrimental. And even more, it is very likely that many property owners will not pay the property taxes or the costs associated with the Proposed SSD. What happens then? How will the shortfall be covered? Suffice it to say that the general tax already imposed upon all the property owners should provide for the services that the Proposed SSD claims it will perform.

### **Community Prosecutor**

Part of the multi-million dollar budget includes the hiring and paying of an attorney to pursue chronic offenders in downtown St. Paul. The City of St. Paul as well as Ramsey County already have prosecutors who certainly can (and should) prosecute all appropriate crimes committed in St. Paul. Placing the expense of an attorney on a select few property owners to prosecute crimes that the City of St. Paul and/or Ramsey County should already be prosecuting is absurd and illegal. St. Paul needs government accountability...not private businesses taking over the prosecution of crimes.

### **The Budget**

The budget lacks necessary detail. Pursuant to Minn. Stat. Chapter 428A, service charges for the Proposed SSD may only be imposed in an amount needed to pay for an increased level of service. After reviewing all the publicly available information, the Property Owners have no way to determine if the multi-million dollar budget actually reflects any type of costs associated with an increased level of service. Certainly it does not as it relates to the "community prosecutor" discussed above. Indeed, what is the proposed salary for the community prosecutor? What is the salary of Joe Spencer? What are the costs for others?

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What are the costs of picking up trash/cleaning/attorneys/security that are already provided by the general fund tax dollars? Without knowing any of this information, it is impossible to determine if the budget adheres to Minnesota law. Indeed, the hiding of this information is suspicious. The failure to detail this information is cause alone to reject the Proposed SSD.

### **Being Honest About The Situation**

If we take off the blinders, the real situation is this: If the Proposed SSD is approved, then the City of St. Paul clearly wants to place the financial burden of picking up trash in downtown on a select few business owners. But this is something the City of St. Paul should be doing with the general fund tax dollars it already generates. The Property Owners already pay millions in taxes. To impose a new tax upon the Property Owners to pay for people they do not know or control to wonder around St. Paul and pick up trash borders on absurdity. In fact, the Property Owners already pay for their own employees to maintain their properties. There is simply no need for more trash pickers and/or ambassadors that have no authority. Any increased tax dollars would be better spent elsewhere, including the hiring of more real police officers to provide enhanced safety.

### **The Costs of the Proposed SSD Are Harmful to Small Businesses**

The Property Owners are small businesses. Larger businesses like Securian are more able to absorb the proposed additional costs. As such, the Proposed SSD disproportionately discriminates against small business. Additionally, if the Proposed SSD is allowed, this will impact whatever tenants remain in the buildings because rents will have to be increased. Once again, given the crisis St. Paul faces, this is not the time to start increasing rents as the remaining tenants are already desiring to leave downtown—let's not make that decision for them.

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**Conclusion**

Joe Spencer attempted to expand the existing special service district in prior years and was rejected by longstanding businesses in St. Paul like Tom Reid's Hockey City Pub, Patrick McGovern's Pub, and Cossettas to name a few. Just like his prior efforts were rejected, the City Council should exercise leadership and reject the Proposed SSD.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelly S. Hadac", with a long horizontal flourish extending to the right.

Kelly S. Hadac, Esq.  
Attorney at Law  
khadac@yahoo.com