

## Vang, Nhia (CI-StPaul)

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**From:** Moser, Lynn (CI-StPaul)  
**Sent:** Tuesday, October 18, 2016 1:50 PM  
**To:** Moermond, Marcia (CI-StPaul); Vang, Nhia (CI-StPaul)  
**Subject:** FW: John N Allen/Industrial Equities Group - Special Assessment Matters  
**Attachments:** IE - Objection to Assessment - Filed with City Clerk (from City Website).pdf

Good Afternoon,

The two addresses identified as having a significant grade difference were discussed at the hearing and Real Estate and Street Maintenance agree that the assessment should be removed for 1004 and 1012 Raymond Avenue.

Thank you.

Lynn

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**From:** Jeffery Mcnaught [<mailto:jeff@jmcnaughtlaw.com>]  
**Sent:** Tuesday, October 18, 2016 12:58 PM  
**To:** Moser, Lynn (CI-StPaul) <[lynn.moser@ci.stpaul.mn.us](mailto:lynn.moser@ci.stpaul.mn.us)>  
**Subject:** John N Allen/Industrial Equities Group - Special Assessment Matters

Lynn,

I write in followup to the hearing on Monday (10/17) regarding the city special assessment levy. I appeared at the hearing on behalf of John Allen/Industrial Equities Group. At the hearing, we discussed the assessment levy on seven parcels owned by Industrial Equities/Affiliates. Of those seven parcels we propose to withdraw our objection to the assessment on five parcels if the city would withdraw the assessment on two parcels. The two parcels I identified were the subject of an assessment levy last year (2015) relating to the reconstruction of Raymond Avenue. While these properties have Raymond Avenue addresses, neither parcel has access to the street and in fact the parcels lie at the foot of an embankment that extends up to the street. Accordingly, neither parcel realistically received any benefit from the assessment. The city agreed then and withdrew the assessment. I attach a copy of the objection filed last year in connection with the Raymond Reconstruction project. The situation is repeated with respect to the current assessment.

Our request is that the current assessment be withdrawn for the same two parcels as it was for the past assessment. The parcels are these:

Property Reference	Address	PID	Amount
Bradford Industrial	1012 Raymond Ave	29-29-23-13-0028	\$1,726.54
Bradford Industrial	1004 Raymond Ave	29-29-23-13-0030	\$878.24

The other parcels for which objections were submitted are these in the table below.

Property Name	Address	PID	Amount
Annex	2346 Wycliff St	29-29-23-42-0009	\$499.00
Annex	2342 Wycliff St	29-29-23-42-0010	\$499.00
Annex	935 Bradford St	29-29-23-42-0011	\$2,934.12

Meridian	620 Pelham Blvd	32-29-23-21-0042	\$8,343.28
Bradford	2392 Wycliff St	29-29-23-13-0036	\$1,836.32

Please contact me with any questions. Thank you much.



**Jeffery J. McNaught**

201 Ridgewood Avenue  
Minneapolis MN 55403

Office: [612.578.8455](tel:612.578.8455)

Cell: [612.964.2758](tel:612.964.2758)

Email: [jeff@jmcnaughtlaw.com](mailto:jeff@jmcnaughtlaw.com)

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INDUSTRIAL EQUITIES L.L.P.

Item 51

*Development and Investments*

TEL 612 332 1122

321 First Avenue North, Minneapolis, Minnesota 55401

FAX 612 332 0241

E-MAIL jallen@industrialequities.com

RECEIVED

MAY 06 2015

Hand delivered and certified mail

May 6, 2015

CITY CLERK

**Re: Proposed project of improving Raymond Ave-Hampden to Energy Park Drive**

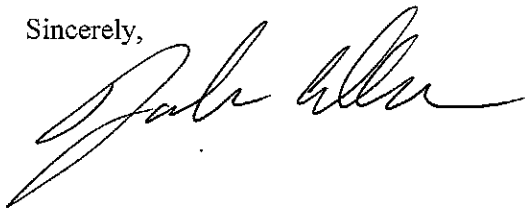
Dear City Council Members,

Bradford Industrial Properties LLC owns two parcels at 1004 Raymond Ave (PID # 29-29-23-13-0030) and 1012 Raymond Ave (PID # 29-29-23-13-0028).

For the past 100 years, because of the dramatic topographical change these lots have never had access to Raymond Avenue and would receive no benefit from the proposed Raymond Avenue improvement. Based on the attached photos you can see that the sites sit well below Raymond Avenue and any access and therefore benefit is impractical.

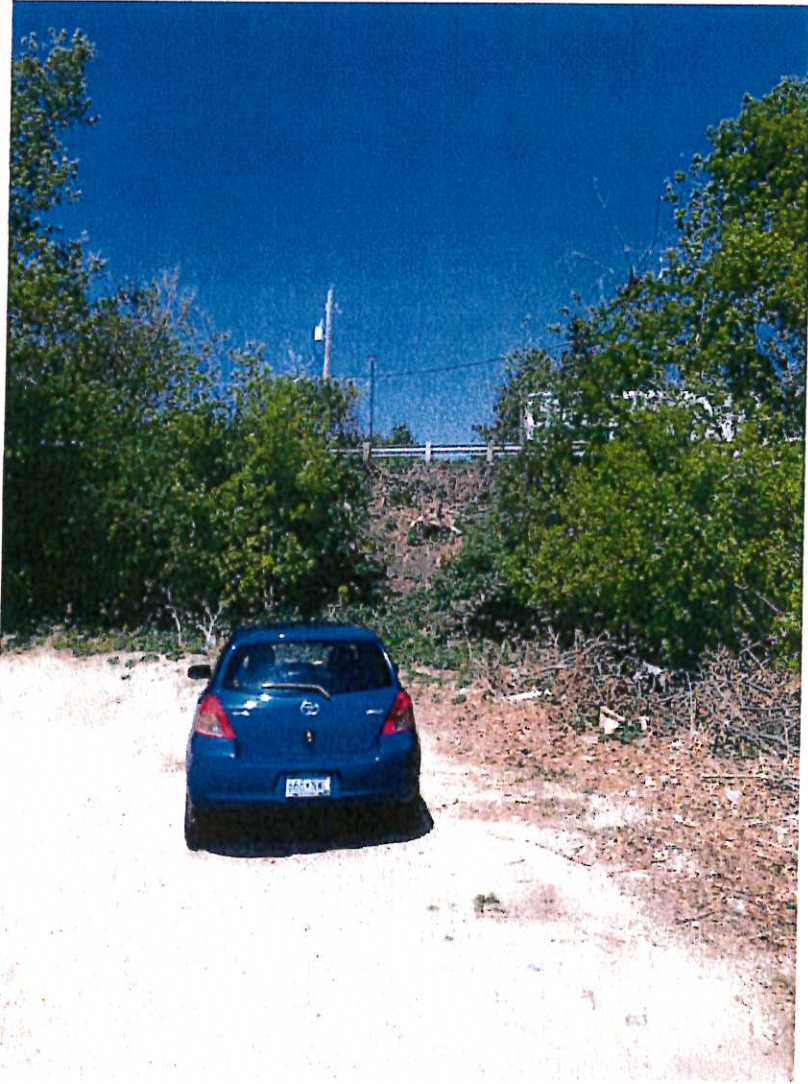
Please consider this our official timely protest of the proposed assessments, and according to preservation of our legal right to seek further action.

Sincerely,

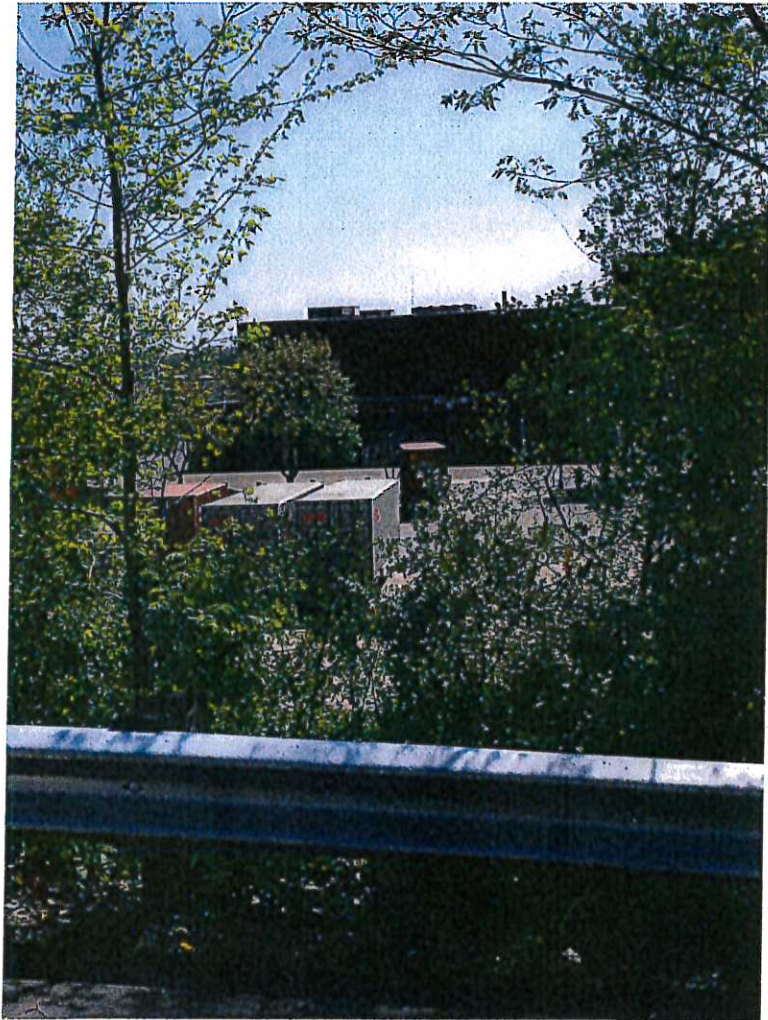


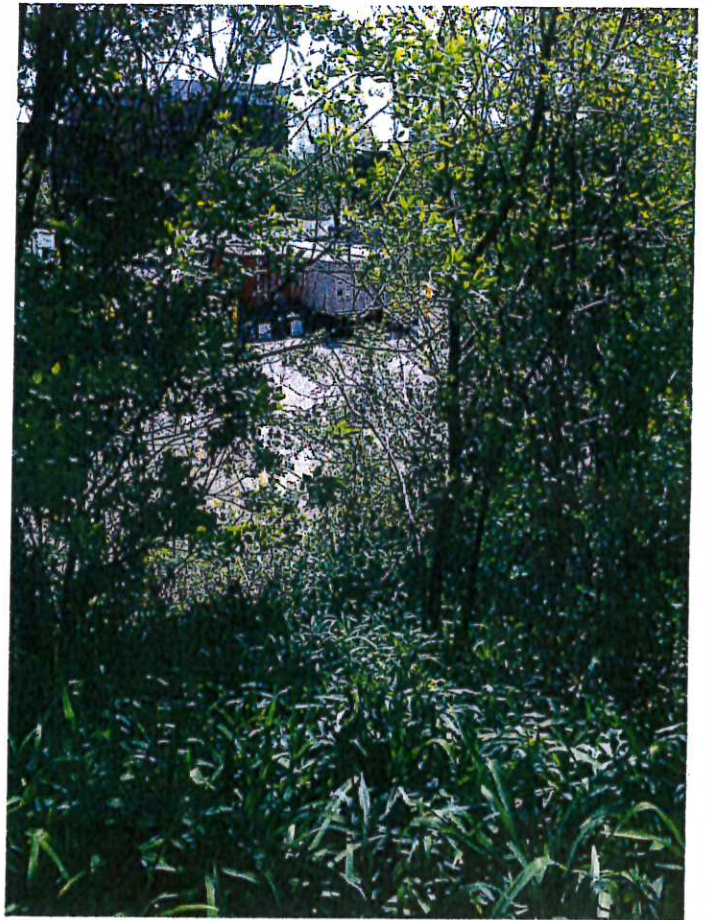
John N. Allen

Cc: Neil Polstein















# Saint Paul City Council

## Public Hearing Notice

### Public Improvement Construction

#### OWNER OR TAXPAYER

Bradford Industrial Prop Llc  
321 1st Ave  
Mpls MN 55401-1609

RECEIVED  
MAY 06 2015  
CITY CLERK

COUNCIL DISTRICT # 4  
PLANNING COUNCIL # 12  
FILE #19171  
PROPERTY ADDRESS  
1012 RAYMOND AVE  
PARCEL ID  
29-29-23-13-0028

#### PROPERTY TAX DESCRIPTION

REGISTERED LAND SURVEY 339 TRACT A

**THE TIME:** Wednesday, May 06, 2015 at 5:30 PM  
**PUBLIC PLACE:** City Council Chambers, 3rd Floor City Hall-Court House  
**HEARING** Written or oral statements by any owner will be considered by the Council at this hearing.

**PURPOSE** To consider approval of the proposed project as follows:  
Improving Raymond Ave- Hampden to Energy Park Drive

**ESTIMATED ASSESSMENT INFORMATION** If the City Council approves the project, all or part of the cost will be assessed against the benefited properties. The ESTIMATED assessment for the above property is **\$24,306.50**.

NOTE: THIS IS NOT A BILL!

Please see PAYMENT INFORMATION on the reverse side of this notice.

<b>ESTIMATED ASSESSMENT CALCULATION</b>	Grade and Pave	173.00	X	\$119.37 / foot	=	\$20,651.01
	Lighting	173.00	X	\$21.13 / foot	=	\$3,655.49

Invoice will be sent to the taxpayer



# Saint Paul City Council

## Public Hearing Notice

### Public Improvement Construction

#### OWNER OR TAXPAYER

Bradford Industrial Prop Llc  
321 1st Ave  
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RECEIVED

MAY 06 2015

CITY CLERK

COUNCIL DISTRICT # 4

PLANNING COUNCIL # 12

FILE #19171

PROPERTY ADDRESS

1004 RAYMOND AVE

PARCEL ID

29-29-23-13-0030

#### PROPERTY TAX DESCRIPTION

REARRANGEMENT OF BLOCKS 62, 67, 68 AND LOT 1 OF BLOCK 75 ST. ANTHONY PARK SUBJ TO ST THE FOL; PART OF LOT 2 NELY OF FOL L; COM AT SE COR OF LOT 1 BLK 1 TH NLY ALONG EL OF LOTS 1 & 2 148.34 FT TO PT OF BEG TH N 73 DEG 17 MIN 10 SEC W TO RAYMOND AVE AS WIDENED & THERE TERMINATING & ALL OF LOTS 3 & LOT 4 BLK 2

**THE TIME:** Wednesday, May 06, 2015 at 5:30 PM  
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Improving Raymond Ave- Hampden to Energy Park Drive

**ESTIMATED ASSESSMENT INFORMATION** If the City Council approves the project, all or part of the cost will be assessed against the benefited properties. The ESTIMATED assessment for the above property is **\$12,364.00**.

NOTE: THIS IS NOT A BILL!

Please see PAYMENT INFORMATION on the reverse side of this notice.

<b>ESTIMATED ASSESSMENT CALCULATION</b>	Grade and Pave	88.00	X	\$119.37 / foot	=	\$10,504.56
	Lighting	88.00	X	\$21.13 / foot	=	\$1,859.44

Invoice will be sent to the taxpayer