

Council Member Rebecca Noecker 15 Kellogg Blvd. West 310 City Hall St. Paul, MN 55102

Dear CM Noecker,

I am writing today to express my disappointment that the St. Paul City Council is poised to approve ordinance 19-38 and to ask for your vigilant assistance in monitoring the construction activities on this site.

Over a month ago, the Carpenters Union began interacting with the West Side Community Organization (WSCO) regarding Reuter Walton's proposed project at 84 Water Street. We shared information regarding Reuter Walton's past subcontractors and their abysmal record of labor violations including wage theft, child labor, labor trafficking, misclassification, unpaid overtime, workers compensation premium fraud, and theft.

Without our knowledge or participation, Reuter Walton and WSCO came to a so-called "Community Benefits Agreements" that falls short in many ways. It relies on self-reporting and there are no accountability measures built in the likely event that their subcontractors continue their horrendous record of labor violations. We sincerely hope that we are wrong about what kind of activities will occur on this jobsite, but we are concerned about worker protections at this site and want you all to know how serious this project is for us. In our experience, an agreement like this CBA, doesn't address the underlying issues but rather it gives cover to employers who are unsafe and cheat their workers.

On behalf the North Central States Regional Council of Carpenters, we ask that you examine ways to strengthen the oversight of developers and subcontractors who have this type of track record. We just assisted in passing nation-leading wage theft protections at the MN legislature and if there are additional policy measures we can enact and help to enforce in St. Paul, we stand prepared to do so.

In Solidarity,

Adam Duininck

**Director of Government Affairs**