

Dear Councilmembers:

Thank you for your continued efforts to safeguard City residents who rent and may need protection from private landlords' actions through the proposed Tenant Protections Ordinance. We applaud the City Council's work in this arena. I understand that at the June 17, 2020, City Council meeting there was a discussion regarding proposed exemption language in Sec. 193.12, and that section will be revisited on June 24, 2020.

First, we support the exemption language from Version 4 of the ordinance as proposed, and set forth below:

Sec. 193.12 Exemptions.

(a) Any dwelling unit which is owned, operated, or subsidized by a federal government agency, and which is therefore subject to federal housing program regulations, is exempt from the requirements of this Chapter.

However, if there is concern that the Version 4 language would reach beyond the Public Housing Agency of the City of Saint Paul to those private landlords who participate in less regulated federal housing programs (such as the Low Income Housing Tax Credits (LIHTC) program), please let me offer the following adjustment to the language in Version 4:

(a) Any dwelling unit which is owned or operated by the Public Housing Agency of the City of St. Paul, and which is therefore subject to federal housing program regulations, is exempt from the requirements of this Chapter.

With respect to landlords who participate in the Section 8 Housing Choice Voucher (HCV) program, while PHA staff proposed an innovative way to exempt them and increase affordable housing opportunities, perhaps that is a discussion for another day. While all dwelling units that are owned, operated, or subsidized by the PHA are already subject to Federal Regulations and PHA policies regarding lease requirements, screening criteria, rent and deposit amounts, and housing quality standards, *inter alia.*, and while there are extensive federal laws that cover both the PHA and those private landlords who choose to participate in the Section 8 HCV program, questions have arisen that may require more time to research.

Please do not hesitate to contact me if I can answer any questions on the suggested changes set forth here or in our May 28, 2020, correspondence (attached again FYI).

Best regards,
Jon Gutzmann



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