

From: [Cathy Capone Bennett](#)
To: [*CI-StPaul_Contact-Council](#); [CouncilHearing \(CI-StPaul\)](#)
Subject: Re: Public Comment For April 9 Council Meeting Public Hearing - Rent Stabilization and Tenant Protections
Date: Tuesday, April 8, 2025 12:01:44 PM
Attachments: [Outlook-ghddxbdf](#)
[Outlook-guifnlne](#)
[TCHA - Real Cost of Rent Control updated Feb 5 short version.pdf](#)
[TCHA Public Comment on St Paul Rent Stabization Ordinance Modifications.pdf](#)

Some people who received this message don't often get email from cathy@tchousingalliance.com. [Learn why this is important](#)

Attached is the letter as a pdf. Sorry for the error. Thanks

Cathy Capone Bennett
Executive Director
Twin Cities Housing Alliance
cathy@tchousingalliance.com
612-670-8147



For more information visit our website:
<https://tchousingalliance.com/>

From: Cathy Capone Bennett <cathy@tchousingalliance.com>
Sent: Tuesday, April 8, 2025 11:59 AM
To: Contact-Council@ci.stpaul.mn.us <Contact-Council@ci.stpaul.mn.us>;
CouncilHearing@ci.stpaul.mn.us <CouncilHearing@ci.stpaul.mn.us>
Subject: Public Comment For April 9 Council Meeting Public Hearing - Rent Stabilization and Tenant Protections

Please see that attached letter of public comment for the City Council meeting on April 9th.

Cathy Capone Bennett
Executive Director
Twin Cities Housing Alliance
cathy@tchousingalliance.com
612-670-8147



For more information visit our website:
<https://tchousingalliance.com/>



April 8, 2025

Dear City of St. Paul City Council Members:

RE: Ordinance 25-29 and 25-31

Thank you for the opportunity for Twin Cities Housing Alliance's (TCHA) to provide input on the proposed Ordinance 25-29 and 25-31.

The Twin Cities Housing Alliance (TCHA) is a collaborative network dedicated to addressing the housing challenges and strengthening community vitality in the Twin Cities region. Our network of over 100 experienced housing professionals advocate for policies to create a more affordable, equitable, economically vital, and environmentally sustainable future for the Twin Cities community. We are deeply involved in and concerned about finding practical solutions to address the alarmingly short supply of housing of all types.

Elimination of new housing from rent control may help increase new housing production. However, TCHA believes that only a full repeal of the rent stabilization policy will create a healthy housing ecosystem in St. Paul and the entire region. We note that 90% of St. Paul's existing rental housing will still be affected by the 3% rent cap, potentially limiting property improvements for safe and quality housing. The impact of these regulations is detailed in [TCHA's Public Cost of Rent Control](#) resource linked and attached to this letter.

In addition, the city is proposing tenant protections including security deposits, application screening, notice of nonpayment of rent, notice of sale, relocation assistance, and complaint process. Minnesota has some of the strictest tenant protections of any other state in the country. Any additional requirements only make it more difficult for housing providers to provide quality, safe housing for all of their residents. We urge you to maintain tenant protections that align with current state law.

Thank you for your consideration of the materials attached regarding rent stabilization. We encourage you to focus on meaningful solutions to address the housing crisis by removing barriers, providing flexible funding for production and increasing rent subsidies for those who are most impacted.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robb Bader", written over a horizontal line.

Robb Bader, TCHA Board President
President, Bader Companies

A handwritten signature in blue ink, appearing to read "Cathy Capone Bennett", written over a horizontal line.

Cathy Capone Bennett
Executive Director, TCHA

While rent control aims to address housing affordability, it does not directly solve the challenges that many renters face. Lower-income renters are burdened by limited incomes that make it difficult to afford their housing costs even more, and wages have not kept pace with the escalating cost of housing. Rent control hinders the ability to accommodate population growth necessary to support thriving communities and an economically sustainable region and state. These realities highlight the urgency of addressing housing affordability, but rent control fails to effectively tackle them. Instead, it leads to decreased housing production, discourages capital investment, reduces property maintenance, and disproportionately impacts the very renters it seeks to protect. By limiting the ability to increase housing supply, rent control worsens the existing housing shortage, making it harder for new residents to find affordable housing.

Disproportionately Impacts Low Income Renters



- Affluent Renters Reap the Benefits at a Higher Rate Housing Mobility and Opportunity is Reduced
- Does not Address Predatory Practices

- **Data:** In New York City, 39% of affluent renters and 37% of white renters receive a discount due to rent control, compared to only 16% of black and 17% of Hispanic renters.

Reduces Housing Production



- Housing providers are discouraged from building new housing due to reduced returns on investment
- Investor interest in the market is diminished making it difficult for housing providers to access necessary capital.

- **Data:** St. Paul experienced an 80% decline in multifamily building permits after adopting rent control. In the first half of 2024 in St Paul, permits dropped to 140 units compared to 1,025 units during the same period the previous year.
- **Example:** At Highland Bridge, plans for over 2,000 market-rate apartments were largely suspended, with only a fraction of the intended units completed or under construction.

Negative Economic Consequences



- Property Values are Diminished
- Public Budget Deficits Increase
- Less Funding for Essential Services: police, fire, parks, infrastructure, maintenance.
- Shifts Tax Burden to Single Family Owners
- Adds Costs to City Regulatory Services
- Misallocates the Burden to Small Businesses - Owners and Operators

- **Study:** A recent study In St. Paul found that rent control will result in an aggregate loss of \$1.6 billion in total property values impacting not only city revenues but also county and schools resulting in a nearly 25% property tax increase across the city, school district, and county
- **Example:** The Landmark Tower redevelopment in St. Paul required \$21 million in tax increment financing to proceed; This is estimated to be a 20% increase in public financing needed due to the added risk and cost of rent control.

Discourages Housing Maintenance = Lower Quality Buildings & Communities



- **Deferred Maintenance and Deterioration:** property owners defer maintenance or repairs due to limited ability to recoup these costs. This disproportionately impacts lower- income renters who are more likely to live in older properties
- **Deterioration of Neighborhood Quality:** When housing providers' costs go up and maintenance goes down, there's a notable rise in residents reporting serious crimes, complaining of trash and litter in the streets and on sidewalks, and finding that their units are severely inadequate.
- **Displacement through Demolition and Conversion:** Rent control policies often create incentives for owners to demolish older buildings and replace them with new ones to avoid rent control restrictions, leading to tenant displacement and a decrease in overall neighborhood affordability.

- **Data:** 61% of property owners in St. Paul have reported reducing maintenance spending. The requirements to receive a waiver to enable increasing rents to cover capital investments is complex and onerous. If pursued these costs are passed onto renters which is counterproductive to the intent of keeping rents stable. As an alternative, owners automatically increase their rents 3% per year to build reserves rather than pursue waivers.
- **Data:** In New York, rent control has led to landlords converting rent-controlled buildings into condominiums or cooperative housing to circumvent rent restrictions, significantly reducing the availability of affordable rental units.
- **Data:** In San Francisco, owners withdraw units from the rental market altogether, often through redevelopment.
- **Example:** Union Park Management, a property management company in St. Paul, acquired a building in severe disrepair for well below market value due to its condition. Without rent control, the company could have gradually increased rents to fund substantial improvements. This would have created a sustainable cycle of investment, benefiting both tenants and the broader housing market. To bring the building up to standard, they instead had to apply for a one-time exemption to raise rents significantly.

Alternatives to Rent Control

Cities have ample tools to effectively address rental housing affordability, rather than imposing rent control. These public sector tools, in partnership with the private and nonprofit sectors, should be utilized to their full extent.



Protect and Prioritize Vulnerable Residents.

Why This Matters: Protecting vulnerable residents ensures they have the stability needed to thrive and contributes to the overall health and vitality of our communities. Direct assistance programs help to mitigate displacement and promote equity.

Direct Rental Resident Assistance & Renter Stabilization:

- Partner with public housing agencies to deploy over \$100 million in annual state funding from the "Bring it Home" renter assistance voucher program. Target the assistance to those who may be experiencing rent increases beyond their ability to pay.

Promote Safe and Fair Housing:

- Enforce tenant protections against unfair practices and provide legal assistance for tenants facing eviction or dealing with unsafe housing conditions. Invest in code enforcement staff for more proactive inspections and swift response to housing quality conditions where the health and safety of residents may be at risk.
- Partner with law enforcement to address safety and security concerns.



Improve Housing Quality While Retaining and Expanding Affordability.

Why This Matters: Preserving existing affordable housing ensures that current residents are not displaced, and that the quality of the housing stock is maintained. It also helps prevent the loss of affordable units due to deterioration or conversion to higher-rent properties.

Maintain Affordability of Naturally Occurring Affordable Units:

- Utilize property tax incentives such as the 4D Tax Program to provide property improvements while ensuring long-term affordability.
- Expand partnerships to support the strategic housing opportunity acquisition program, allowing the city to buy/repossess delinquent owned buildings and sell them to private and non-profit housing providers who agree to maintain renter affordability.

Funding for Reinvestment & Rehabilitation:

- Provide funding and support for a renter relocation fund when a property's rental license is revoked, and residents are forced to move. Recapture the fund through assessment back to the property.
- Provide capital and operating subsidies to property owners to help reinvest in and maintain older buildings. Offer tax incentives and low-income housing tax credits for rehabilitation projects.



Increase Housing Supply.

Why This Matters: Increasing the housing supply is crucial for alleviating the pressure on the current housing market, making it easier for residents to find affordable housing and reducing overall housing costs. Public investment and strategic policy adjustments can significantly boost housing production and availability.

Increase Production:

- Leverage and/or create an affordable housing trust fund to increase new affordable and supportive housing. Dedicate local sales tax revenue to an affordable housing trust fund for new housing opportunities in partnership with the public and private sectors.
- Evaluate expansion of the Tax Increment Finance tool through bonding to support new income restricted housing developments.
- Support an office/hotel conversion tax credit and flexible zoning/permitting to increase housing options in place of underutilized properties.

Elimination of Unnecessary Barriers:

- Remove density restrictions and allow higher densities in areas where such density is supported, such as resource-rich neighborhoods and along transit corridors
- Streamline and standardize approval processes to avoid delays and reduce costs associated with new housing projects.

From: [Nathaniel M Hood](#)
To: [*CI-StPaul Contact-Council](#); [CouncilHearing \(CI-StPaul\)](#)
Subject: Support for Rent Stabilization Amendments with Concerns on Additional Provisions
Date: Tuesday, April 8, 2025 9:36:10 AM

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Dear Councilmembers,

I'm writing to express support for the proposed amendments to the rent stabilization ordinance. Please support Mayor Carter's in the effort to increasing the housing supply and help grow the city's tax base, reducing pressure on low-income homeowners and renters alike.

Saint Paul urgently needs more housing to improve affordability, stabilize the rental market, and prevent residents from being stuck in unsafe or unstable situations.

The current rent stabilization policy, while well-intentioned, has made financing new development extremely difficult. The proposed amendment offers much-needed clarity and predictability (especially for small and local developers) while preserving the core renter protections.

That said, I do have concerns about 2 other proposals currently being considered which I suggest weakening the language in order to prevent "off the books" discrimination, particularly:

1. Limiting Use of Credit Scores in Screening:

As someone who has managed properties on and off since 2004, I've found credit score, while imperfect, to be the most reliable predictor of tenant reliability; more so than income or rent-to-income ratio. I've learned the hard way that having a lower-income renters with stronger credit histories is better than an higher-income applicant with a poor credit scores. Removing or limiting this tool would reduce people's ability to assess risk, and could lead to unintended consequences, such as more racial discrimination in housing or increased non-refundable application fees to offset uncertainty (which some landlords are already starting to do).

2. Capping Security Deposits:

While well-meaning, limiting deposits might likely backfire by encouraging more non-refundable application fees nonrefundable costs that can burden high-risk applicants even more. Security deposits at least offer the potential for return, with interest. I think the number for a maximum should be bumped up to 1.5x one month's rent. It's not common for deposits to be higher (this is a niche issue currently), but it helps off-set risk and may lead to fewer low-income tenants having stable housing.

In summary, I support the rent stabilization amendment as a crucial step toward a more affordable and functional housing market. However, I urge caution on the two above elements of the tenant protection proposals that could inadvertently limit housing access, investment, and safety.

Thank you for your service and consideration.

Sincerely,
Nate Hood

1907 Hampshire Ave, STP

From: [Mary Henke-Haney](#)
To: [CouncilHearing \(CI-StPaul\)](#)
Subject: Support rent stabilization amendment
Date: Tuesday, April 8, 2025 6:41:20 AM

You don't often get email from mahenkehaney@gmail.com. [Learn why this is important](#)

Keeping it brief: I support the rent stabilization amendment and hope you do too.

Thanks,
Mary Henke-Haney
1423 Charles Ave (W4)

From: [Sustain Saint Paul](#)
To: [CouncilHearing \(CI-StPaul\)](#)
Subject: Tenant Protection letter of support from Sustain Saint Paul
Date: Monday, April 7, 2025 8:16:13 PM
Attachments: [Sustain Saint Paul letter to CMs 4-7-2025.docx](#)

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Dear City of Saint Paul City Council,

Please see the attached letter of support for the tenant protection ordinance from Sustain Saint Paul. Thank you!

~Melissa Wenzel
Sustain Saint Paul Co-chair



Abundant housing, low-carbon transportation, and sustainable land use

Sustain Saint Paul

PO Box 16164, Saint Paul, MN 55116

www.sustainstpaul.org | info@sustainstpaul.org

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Our Mission

Sustain Saint Paul champions abundant housing, low-carbon transportation, and sustainable land use in the City of Saint Paul through education, advocacy and political action, to ensure a more just and equitable city for all current and future residents.

April 7, 2025

Attention: Saint Paul City Council

Dear City Council members,

On behalf of Sustain Saint Paul, we urge your support for Ordinance 25-29, which would permanently exempt new apartments—and those built since 2005—from the rent stabilization ordinance, and for Ordinance 25-31, which strengthens essential tenant protections across our city.

We support both ordinances because they reflect the dual priorities of expanding our city's housing supply while ensuring that renters are treated with fairness and dignity.

It's no secret that the initial rent stabilization ordinance passed in 2022 had an unintended chilling effect on housing development. Since then, our housing stock has stalled while demand continues to grow. This limited supply is contributing to rising rents and increased competition for available units. If we want Saint Paul to be a city where people of all incomes can live and thrive, we must encourage the development of new housing—while also safeguarding renters from instability and discrimination.

We are grateful to Councilmembers Rebecca Noecker, Anika Bowie, and Saura Jost for their leadership in supporting both proposals. Ordinance 25-29 ensures that new construction—which brings much-needed housing and increased property tax revenue—won't be disincentivized. Meanwhile, Ordinance 25-31 delivers meaningful tenant protections that are long overdue.

This includes prohibiting discrimination against renters, requiring fair notice when a building is being sold or when eviction is being considered, limiting excessive security deposits, and protecting tenants

from retaliation for asserting their rights. These are basic, common-sense standards that align with our values as a city—and should not pose an undue burden on responsible landlords.

Saint Paul can and should be a model for cities that care about both housing access and renters' rights. By passing these ordinances together, we send a clear message: Saint Paul believes in affordable, abundant, and safe housing for everyone.

Let's not wait any longer to take action. Our residents—and our city's future—are counting on us.

Sincerely,

Sustain Saint Paul Board of Directors



From: [Kevin Gallatin](#)
To: [*CI-StPaul Contact-Council](#)
Cc: [Kevin Gallatin](#)
Subject: Support for tenant protections
Date: Monday, April 7, 2025 8:11:56 PM

You don't often get email from kevingallatin00@gmail.com. [Learn why this is important](#)

Council President Noecker and council members,

I'm writing in support of tenant protections ordinance 25-31. The importance of safe and stable housing cannot be overstated. Losing access to housing often causes a domino effect for individuals that affects their ability to work, learn, and care for themselves and family members, ultimately resulting in strained public resources. This ordinance offers meaningful and enforceable protections for residents of Saint Paul. I believe it is strongly in the public interest to pass this and I urge your support.

Thank you,
Kevin Gallatin
1822 Highland Pkwy
Ward 3

From: [James Slegers](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Delay vote on Ordinance 25-29, pass 25-31
Date: Monday, April 7, 2025 6:26:35 PM

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Councilmembers,

I currently do not have a council member representing me, and given that rent stabilization was passed by the voters of the City of St Paul, I would very much appreciate having representation on any vote to change that policy. Ward 4 was amongst the strongest supporters of the original referendum and should have a voice.

I believe that tenant protection is a much more urgent need than new construction, and I encourage you not just to pass Ordinance 25-31 but to find routes to better staff city offices to give that ordinance teeth.

Thank you,
James Slegers (he/him)
Ward 4

From: [Joe Baierl](#)
To: [CouncilHearing \(CI-StPaul\)](#)
Subject: Public Comments on 25-29 and 25-31 for April 9 meeting
Date: Monday, April 7, 2025 5:46:44 PM

You don't often get email from joe.r.baierl@gmail.com. [Learn why this is important](#)

Hello,

I posted a comment to the City Council site, but noticed that I did not enter my name and address properly (my user error, I'm sure). So I am reposting my comment here so you know who I am.

My address is in Ward 2: 406 Wacouta Street Unit 210, St Paul 55101 My other contact info is below.

Here is the comment I posted for Amendment 25-29:

My wife and I moved to Lowertown in Aug 2018. We intend to stay in our condo long term and care deeply that Downtown achieve a population of 20 to 30 thousand residents so that our neighborhood can sustain grocery stores, pharmacies, and all the services needed to support a diverse, walkable community. We need new housing to achieve this goal: Small, medium and large sized units. Affordable, mid-level, and luxury units. Rental and owner occupied units. The investments needed to build these units will not come to Saint Paul without the passage of this amendment, so I urge the City Council to do so immediately. The current residents of Downtown know we need PEOPLE. We will welcome diverse people and diverse housing, so there is real opportunity here to create a special community, if you pass this amendment, build housing and plan for vital and healthy expansion of Downtown. Lastly, I also believe that this amendment is the right thing for ALL of St Paul not just Downtown.

Here is my comment for Amendment 25-31:

I view this Amendment as the other side of the coin, to Amendment 25-29. The rent stabilization law does need to be relaxed, yet tenant needs and tenant rights are truly important. This amendment will provide some relief for the deposit issue. The amounts have become larger than they need to be for landlord protection, so this Amendment should also be passed immediately. In addition I ask the City to please keep an eye on tenant issues in the future — for the sake of fairness and to help make St Paul a place where renters want to live.

Joe Baierl
Mobile: 612-963-5235
joe.r.baierl@gmail.com