

Downtown St. Louis Safety and Security

Causes and Impacts of Nuisance Properties

July 2023



**CITIZENS FOR A GREATER
DOWNTOWN ST. LOUIS**

About Citizens for a Greater Downtown St. Louis:

The mission of Citizens for a Greater Downtown St. Louis is to mobilize residents, businesses, property owners, developers, and anyone with a passionate interest in downtown St. Louis to advocate for effective planning and action to make downtown the premier neighborhood in the St. Louis region to live, work, and play. We advocate for changes in governance, finances, policy, and strategy as needed to make downtown better.

Our network currently consists of a diverse group of members and affiliated “friends”, representing Downtown residents, businesses, developers, and investors. Most of our members live in Downtown and the remaining members are long-term investors and property owners Downtown. We are all volunteers, and we have no consultants or employees. There are no vested interests or hidden agendas.

*While we all love our downtown and choose to live, work, and invest here, we know that there are problems that must be addressed if downtown is going to thrive. So, we often focus on calling attention to those problems. But we are not just about pointing out problems and complaining about the state of downtown. We develop and advocate for solutions. The [*Five-Point Safety Proposal*](#), developed in partnership with the Downtown Economic Development Council and the Downtown Neighborhood Association for example, addresses ongoing security issues. We have drafted city ordinances to address problems with [*surface parking lots*](#) and [*short-term rentals*](#).*

The opinions and positions of our group are developed based on our combined decades-long experience of living, working, and investing in Downtown. Our sole interest collectively and individually is in improving the neighborhood where we live, work, and invest.

For more information about Citizens for a Greater Downtown St. Louis please see our website: <https://www.citizensforagreaterdowntown.org/>

Downtown St. Louis Safety and Security - Causes and Impacts of Nuisance Properties

I. Summary

This brief report was developed by Citizens for a Greater Downtown St. Louis to illustrate the impact of nuisance properties on safety and security in our neighborhood. As we and other organizations noted in the paper [Making Downtown St. Louis Safer – A Five-Point Proposal](#)¹ over two years ago, the proliferation of nuisance properties like the Tucker Blvd. Shell gas station create opportunities for criminal and disorderly behavior to flourish. Additionally, they contribute to increased workload for police, who must answer hundreds of calls for service at these locations, limiting their ability for regular patrols and proactive policing.

This report concludes that the City of St. Louis, by its inaction and inattention has played a significant role in the creation and ongoing existence of nuisance properties. Through its regulatory and enforcement authority, the City has the tools to abate nuisance properties or prevent them from happening at the outset. However, the City has systematically over many years been reluctant to use its existing authority to deal with this problem. And there doesn't seem to be a shared sense of responsibility among disparate city agencies to tackle nuisance properties using cooperative and collaborative strategies.

As the Five-Point Plan points out, safety and security are not the sole responsibility of the police. By addressing nuisance properties, the granting of liquor licenses, enforcement of the Excise Code, problems with short-term rentals, and other issues that are sources of crime, much can be done to reduce the workload of police and allow them to spend more time on patrol in a more effective crime prevention and community relations role.

Because of the reluctance of the City of St. Louis to consistently enforce its own ordinances, citizens have been forced to do so through lawsuits and other means. Citizen groups, including the Downtown Neighborhood Association and Citizens for a Greater Downtown St. Louis, have provided photos and videos of disorderly and criminal conduct to the media to increase public pressure on landlords, property managers and government officials. In some cases, representatives of these citizen groups have taken the initiative to reach out to landlords and property managers to abate nuisance behaviors and have had some success. More properly, this should be the role of the Downtown St. Louis Community Improvement District, an organization that has the resources to engage property owners more systematically and take legal action where necessary, but they have been conspicuously absent from any such activities.

While the current administration deserves criticism for lack of an effective approach to dealing with dealing with persistent nuisance properties, past administrations are guilty of the same lack

¹ <https://www.citizensforgreaterdowntown.org/s/A-Five-Point-Safety-Proposal.pdf>

of action on the issues. This is a systemic cultural problem in city government that has existed for decades.

Rather than simply define the problem, we make a number of recommendations to address it. These recommendations are largely adapted from the Five Point Plan that was previously published. One notable addition is a proposal that the City form an interagency task force to address nuisance properties in a timely and systematic way.

II. Introduction

This is the second article in a series examining the causes of Downtown insecurity. The first article² focused on quantifying the level of Downtown crime and the inconsistent and generally inadequate allocation of police manpower to Downtown (and the 4th policing district generally). This article focuses upon the City's administrative role in the proliferation and persistence of Downtown's many nuisance properties. Using four "case studies" this paper illustrates the multiple failure points in the various administrative systems that allow nuisance properties to remain in our city and in Downtown.

Nuisance properties are responsible for disproportionate levels of crime and disorderly conduct. As an example, the 7-Eleven at 17th St. and Pine St. Downtown, (a nuisance that was only abated when it burned in an arson a few years ago), was responsible for 7,534 calls for service in 29 years, from 1987 to 2015. Recognizing serious problems caused by nuisance properties like the 7-Eleven led the Board of Aldermen to pass a public nuisance law in 2009. However, the City has consistently and systematically failed to use this law and other available tools to prevent and abate nuisances, thus dramatically contributing to increased crime in the City.

Downtown's nuisance properties are a barometer of a larger problem: City government has for decades consistently failed to enforce its own laws and rules, whether SLMPD limiting enforcement of traffic laws, or the Prosecuting Attorney failing to prosecute violent offenders, or the Streets Department failing to hold utilities accountable for complying with their building permit on repairs to street trenches. By its inattention and inaction over many years, City government has become complicit in the burgeoning and destructive growth of nuisance properties. That has placed the burden on citizens and neighborhood groups to attempt to abate nuisances through legal action and other means to enforce the law and compel the City to act.

While the lack of administrative attention to a variety of regulatory and operating controls is a serious problem generally in the City, this report focuses on nuisance properties because of their substantial and easily demonstrated impact on Downtown. This report illustrates the problem using case studies of four well-known properties. These case studies describe failures spanning many City administrations, going back to 1976 in one case, that demonstrate that not only is the City negligent in addressing nuisance properties when they become problematic, but it often plays a pivotal role in creating them at the outset. This responsibility derives from a longstanding and seemingly intentional inability or unwillingness to enforce its own laws, whether the Excise Code, the Building Code, the Zoning Code, the Property Maintenance Code or many others --

² <https://www.citizensforagreaterdowntown.org/s/Downtown-Policing-Report-FINAL-6132023.pdf>

laws are designed to protect the public interest by preventing the creation and continuation of nuisance properties.

This unpleasant history should particularly trouble the Board of Aldermen, the City's legislative branch, which has a primary responsibility to protect health and safety through the passage of appropriate city ordinances. Lacking enforcement powers itself, the Board passes many laws to provide tools to the executive branch to protect the public interest. However, increasingly, the administrative divisions of the executive branch have determined, in violation of governing ordinances, that they have wide discretion to avoid enforcement of city ordinances, particularly when threatened by offending property owners. Too often, that leaves it to citizens to enforce the law by bringing costly lawsuits that are time consuming and provide uncertain outcomes.

III. Case Study #1 - Tucker Blvd. Shell Gas Station

- The Shell gas station and convenience store located on Tucker Blvd. and Convention Plaza has been the worst nuisance property in Downtown since 2017 (when New Life Evangelistic Center was closed) and is one of two current open air drug markets Downtown.
- From 1991 to 2021, there were over 6,350 calls for service to the Shell Station.
- Calls for service have been growing dramatically since the Shell station was allowed to expand in 2015 in violation of the City Zoning Code, with annual calls for service averaging close to 500 from 2019 to 2022.
- From 2019 to today, there have been at least 21 documented shootings at the Shell Station.
- In the last few months, the following dramatic, daytime incidents happened at the Shell station:
 - On May 22nd, at about 1:00 pm on a Monday, a gun battle erupted between occupants of two cars pumping gas, resulting in three men being shot.
 - On February 28th, a dispute between two men at the Shell Station around 10am on a Monday resulted in one man executing another on the sidewalk across from the Shell

City government contributed to the advent of this nuisance property by failing to enforce its own Zoning Code:

- Gas fuel pumping stations (“gas stations”) are prohibited uses in “I” Central Business Districts zoning areas, and have been since at least the 1980’s. Thus, new or expanded gas stations are banned without a variance.
- In 2003, the Tucker Blvd. Shell station closed. However, it applied for a building permit to tear down the existing convenience store hut, create a new convenience store, and otherwise expand the facility.

- Given that gas stations were prohibited uses, state law governs zoning, and an expansion of the facility was planned, the only way this could be done legally would be for the Board of Adjustment to hold a hearing and meet very strict standards for issuance of a variance, which certainly could not be met in this circumstance. No hearing was held.
- Instead, the City let the Shell station apply for a conditional use permit (“CUP”) from the Board of Public Service (“BPS”) which involves a much less stringent process. Under this process, BPS issued the CUP. However, the BPS’ action was clearly unlawful.
- Moreover, according to records from the CUP hearing, the neighborhood association didn’t oppose this CUP because they were told by the Neighborhood Stabilization Officer (who attended the CUP hearing on their behalf) that the Shell station owner agreed to a full-time security guard to address community concerns. However, at the CUP hearing, the Shell owner said they could not afford a security guard and BPS agreed to waive this condition without providing notice to the neighborhood.
- As soon as the gas station reopened in 2004, calls for police service rose and the situation at the property deteriorated. Illegal drug activity gradually infiltrated the area using the busy activity at the gas station as cover.
- In 2015, the owners of the Shell station applied for a building permit to add two additional gas pumps to the four existing. The Zoning Code only allows this if a new CUP was applied for and granted by BPS, which would have required a public hearing. Yet, the City granted a building and occupancy permit without going through the CUP process. This was unlawful.
- Adding the two new gas pumps greatly increased car and foot traffic and calls for service immediately spiked from roughly 150 calls for service in 2015 to almost 700 in 2019.

City Government Has Chosen Not to Abate the Nuisance

In response to the growing chaos and violence at the Shell station, and neighborhood pressure, the Director of Public Safety sent letters in 2017, 2019, 2020 and 2021 to the Shell station owners declaring it a public nuisance and demanding that the owners abate the nuisance. In 2021, the owners of the Shell station were charged in a summons with failure to abate a public nuisance and a court date was scheduled. As far as we know, nothing of substance ever happened because of this process to abate the nuisance except the owners retained security guards late on weekend nights. However, this has done little if anything to abate the 24/7 violence and drug activity at the Shell station, including the two daytime shootings described above.

The City has Frustrated the Efforts of the Community to Abate this Nuisance

In 2022, after finding out the Shell station was operating pursuant to an unlawful CUP, community representatives sent letters to City officials specifying the various violations of the

Zoning Code that have occurred and demanding the City do something about the illegal operation of the business.

In response to these letters, the City's Building Division notified BPS of violations of the CUP. This resulted in BPS holding a CUP revocation hearing. Community representatives offered testimony on three grounds for revocation: 1) the Shell station violated explicit conditions on its CUP, 2) the business violated implicit conditions on its CUP by being a nuisance property, and 3) the gas station violated its CUP by impermissibly adding gas pumps in 2015. BPS decided that a) the Board was not authorized to review the violations in items 2) and 3), reasoning that it had not included these violations in the revocation hearing letter it wrote, and because the Shell had now remedied the violations of explicit conditions that were in the notice letter (despite those violations existing for decades), it had no authority to revoke the CUP.

Community representatives appealed the BPS ruling to the Board of Adjustment on the same three grounds, arguing that the Board of Adjustment had ample grounds to revoke the CUP given its legal *de novo* review rights. The Board of Adjustment deliberated at its meeting on February 8, 2023, and, without indicating the legal grounds, decided to a) restrict the Shell station from operating overnight, and b) impose additional conditions upon the Downtown Shell's CUP, including preventing them from continuing to operate as a nuisance. The Board took a formal vote to impose these conditions. As of the issuance of this paper, over 5 months after the Board's decision, no written ruling has been issued, and the conditions therefore not imposed. No action can be taken until a formal written ruling memorializing the vote taken by the Board is issued. For reasons that remain unknown, the City seems uninterested in issuing a written ruling to implement a lawful vote by the Board of Adjustment.

Given the inaction and indifference of the City, The Globe Building Company, 900 N. Tucker Building LLC, and James Page sent a letter to Tucker Shell, LLC on July 12, 2023 indicating that if Tucker Shell, LLC does not abate the nuisance that exists at the Shell station at 721 N. Tucker within 60 days, then these plaintiffs will bring an action against Tucker Shell, LLC seeking injunctive relief, to prevent the Shell station from continuing to operate as a nuisance property, and damages to compensate them for Tucker Shell, LLC's operation of a nuisance property.

The action now likely to be undertaken by private plaintiffs illustrates a common theme in attempts to abate nuisance properties – private citizens taking on the responsibility of protecting the public interest through lawsuits. This is a direct result of City government abrogating its responsibility to enforce its own ordinances.

IV. Case Study #2 – New Life Evangelistic Center

New Life Evangelistic Center (“NLEC”) was Downtown's worst nuisance property for decades before the City, under intense community pressure and pursuant to a legal challenge, closed this operation in May, 2017. Nuisance activities included:

- At roughly 7:00 am every morning, NLEC would evict hundreds of homeless men from its facility into the neighborhood to use the bathroom, sleep, and loiter about the immediate area until the facility reopened later that night.
- The area around NLEC for blocks around was overwhelmed with loitering, drug dealing and use, overdoses, stabbings, public urination and defecation, gun violence, excessive noise, assaults, fights, and other disorderly and criminal behavior.
- Because of large homeless encampments on the sidewalks surrounding NLEC that the police were forced to erect physical barricades on the sidewalks within a block of NLEC.
- The conditions inside NLEC were abysmal with reported sexual violence, drug use and sales, infestation with lice and bed bugs, constant fights and assaults, a fire-bombing, at least one death from falling over a short railing etc.

The City of St. Louis Created the Nuisance at NLEC

NLEC opened at 1411 Locust St. in 1976 after it secured an occupancy permit for a 32-room hotel on the 4th floor of the facility. However, shortly thereafter, NLEC started operating a homeless shelter and other uses elsewhere in the building, even though the operator never secured another occupancy permit that recognized the significantly expanded and changed use of the facility beyond the 32-bed hotel permit. Nor did NLEC make improvements to an extremely outdated facility to accommodate its other uses, all in clear violation of the Building Code.

By 2012, NLEC was operating the following uses at 1411 Locust, none of which were supported by an occupancy permit (beyond the 32-bed 4th floor hotel):

- A 150 bed men's overnight shelter on the 5th floor
- A shelter for women and children on the 3rd floor
- A non-profit headquarters with offices and services for the homeless on the 2nd and 1st floors
- A church sanctuary on the 1st floor
- A television station on the 1st and 2nd floors
- Several free stores in the basement
- Large quantities of storage areas throughout the building

At times, by its own admission, NLEC would have up to 350 people staying overnight despite only having an occupancy permit for 32 individuals.

Moreover, for at least most of NLEC's time at 1411 Locust, a City ordinance provision was in place that regulated "Licensed Facilities", including homeless shelters. This ordinance required that any homeless shelter that was new or expanding go through a "plat and petition" process to secure consent from the surrounding community. NLEC continuously expanded its homeless shelter occupancy from the 1980's through its closure without once ever seeking consent from the surrounding community as required by ordinance.

However, at no point did the City sanction or attempt to close NLEC for unlawfully operating without required occupancy permits or operating a homeless shelter without a license. By this egregious failure to enforce its own laws designed to protect public health and safety, the City repeatedly created and sustained the nuisance property of NLEC and endangered thousands of homeless individuals. Moreover, even after the public nuisance law was enacted in 2009, despite NLEC's blatant violation, the City never once attempted to enforce its public nuisance law against this property.

The Nuisance was Only Abated After the Downtown Community Forced the City to Act

The process of closing NLEC started with a community led protest action against NLEC's status as a Licensed Facility in front of BPS in 2013. This proceeding resulted in an order from BPS in 2014 revoking NLEC's occupancy permit and requiring it to close. After several years of legal action, the path was finally clear for the City to close NLEC in 2017. This closure immediately caused a positive transformation to the surrounding area. It is now dramatically safer and more economically sustainable.

However, the City is Now Enabling NLEC's Efforts to Reopen this Nuisance Property

However, as soon as it was closed, NLEC started working to reopen as a homeless shelter, but now making the claim that the operation was actually going to be a church, despite clearly intending to offer the same basic shelter and services as it did before it was closed. Despite NLEC's history as a nuisance property and serial misrepresentations, the Building Division on several occasions after 2017 (most recently in 2022) issued building permits to NLEC for this "church" use. More specifically, the Building Division issued these permits despite the fact that NLEC's architectural plans and intended occupancies 1) violate the Zoning Code prohibition on homeless shelters in "I" zoning areas that include Downtown, 2) don't comply with the Licensed Facilities rules, 3) clearly violate the Building Code, including the mechanical, electrical and plumbing codes, and 4) are entirely rooted in familiar misrepresentations to the City. The only reason NLEC remains closed today is the community repeatedly appealing the City's issuance of building permits to the Board of Building Appeals, which has independently voided the building permits issued by the Building Division based upon the grounds asserted by the community.

It remains an illustration of abject failure of responsible administrative systems that NLEC was not only never held accountable for their past behaviors but has been allowed to persist in taking advantage of City agencies that are unwilling or uninterested in enforcing laws that protect the public interest and the surrounding community and turn a blind eye to misrepresentations made by a clearly negligent property owner.

V. Case Study #3 – Reign Nightclub

Reign first opened in August 2020 and was closed by October 2021 after enormous pressure was placed upon City government by Downtown stakeholders and the news media. The level of violence and chaos at and around Reign was remarkable, with at least ten patrons (and a security guard) being shot in multiple gun battles within a 12-month period. Within three months of opening, Reign was shut down three different times for blatantly violating COVID-19 health restrictions when the epidemic was surging. Reign would regularly stay open well past its authorized closing time with large disruptive crowds on the outside terrace and surrounding streets.

Inattentive City Government Contributed to the Creation of this Nuisance

In 2019, Dana Kelly started working to reopen the closed Copia Wine Bar space (11th and Washington) as a 16,000 SF high-end “restaurant”. Ms. Kelly represented on the record to the Downtown Neighborhood Association that she would operate Reign as a restaurant with no live music and vowed that it would never be a nightclub. It became clear immediately after opening that Ms. Kelly had blatantly misrepresented the operation to the neighborhood and to the City on the application for a liquor license. Moreover, Ms. Kelly did not have the financial capacity to provide the working capital to pay for the buildout and startup of this huge nightclub. Rather, others were clearly paying for, promoting, and managing the club.

Prospective liquor licensees, per 14.08.050D of the Excise Code, only have 45 days to obtain the required consent petition signatures without an extension from the Excise Division for good cause shown. Despite Ms. Kelly showing no good cause, the Excise Division extended the 45 days to well over 100, which was enough time for Ms. Kelly to convince enough property owners to sign a petition supporting the license based upon her misrepresentations.

The City Played the Lead Role in Creating and Sustaining this Nuisance Property

The only reason this nuisance property ever existed, and continued to exist as long as it did, is because the Excise Division and the City in general decided to ignore many provisions of the Excise Code that are explicitly designed to protect against situations like this. These included:

- Giving Reign unlimited amounts of time to secure signatures without good cause shown.
- Issuing Reign its liquor license (and allowing it to keep it) despite the allegations, proven over time, that Ms. Kelly was not the actual operator of the nightclub.
- Allowing Reign to continue operating despite the facility not being operated in accordance with the representations in the liquor license or to potential signers (that it would be a high-end restaurant).
- Allowing Reign to keep its license for over a year despite it being a disorderly and violent property, in violation of many Excise regulations that justified revocation.
- Allowing Reign to keep its liquor license despite its constant actions in unlawfully renting the facility to 3rd party promoters.
- Allowing it to continue operating despite Reign’s repeated refusals to conform to pandemic related orders on social distancing and limiting COVID.

In May 2021 the community initiated a petition to revoke Reign's liquor license, based on the various assertions described above. Sufficient signatures were collected, but the protest was ultimately denied after a hearing conducted by the Excise Commissioner. Even after multiple shootings (many documented with videos submitted by citizens or posted on social media), documented violations of liquor laws and other city ordinances, Reign continued to operate unrestrained by any City agency or by SLMPD.

It was only after a high-profile fight and shooting was caught on video by a local businessman and played on the evening news that the City decided to act, and ultimately closed down Reign as a public nuisance for one year. Their liquor license was never revoked.

The club owed large sums to their landlord for back rent. Further, Reign did hundreds of thousands of dollars in damage to the building and engaged in theft of thousands of dollars of fixtures before it moved out. The landlord obtained a large judgment against Ms. Kelly, which likely will never be satisfied.

One of the City's greatest failures related to Reign is the length of time it took to abate this nuisance after it became clear that Reign was a danger to the community. The City's delays in shuttering Reign resulted in immense damage to the neighborhood, the owners of the Reign property, and the many individuals who were shot or otherwise hurt at Reign.

VI. Case Study #4 - Ely Walker Lofts

The Ely Walker Lofts, a condominium building located at 1520 Washington Avenue, has become a nuisance property largely because the majority of the units are owned by a single owner, Asprient, LLC (or other related corporate entities Lux Living and/or STL Citywide, LLC, all owned by Vic Alston and Sid Chakraverty). After purchasing the majority of the 93 units in the building, Asprient installed their own employees on the Condominium Association board, which promptly discontinued all on-site management and maintenance. Their continued negligence has threatened the safety of all of the building's residents, both Asprient's tenants and occupants of the roughly 90 condominium units Asprient does not own.

Within the last year and a half:

- On March 11, 2022, 16-year-old Terrion Smith was shot and killed during an Air BnB party being held within the building. Short-term leases are against the HOA bylaws, however given that there is no on-site management, parties like this were allowed to occur. Numerous other parties of this nature had occurred prior to this incident.
- On July 11, 2022, it was discovered that the fire panel for the entire building was faulty. There has still not been confirmation from the city inspector, fire inspector, etc. that there is a working fire system within the building.
- During July, 2022, the building management company voluntarily ended their contract with the HOA board (all Citywide employees) due to the lack of security within the building. The management company's recommendation for more security was denied by the board. This left the building without a building manager.

- Citywide threatened their tenants, warning them that they would be fined and/or evicted if they called the police for things such as domestic disputes, noise complaints, being threatened in the building, etc.
- There have been serious maintenance problems in the building, including sewer line and roof leaks.
- In March, 2023, there were three shootings involving tenants that were known by other residents to be violent and abusive and that had been previously reported to the police
- According to media reports, Ely Walker generated 247 calls for service over a one-year period starting in August 2021.
- Ely Walker was the scene of a notorious incident when a party in the community room at Ely Walker (which was an after party after a night at Reign) spilled out onto Washington Ave. and resulted in numerous people dancing and stomping on the roof of a police cruiser with the police officer still inside the vehicle. Nobody was ever detained or charged in connection with this incident.

Asprient directly rents some apartment units it owns as STRs (with occupancies of less than 30 days). Further, Asprient rents other units out to tenants who sub-lease the units as STRs. The presence of STRs along with maintenance problems have resulted in the building becoming insecure, which has resulted in large groups entering the building and using the community room for parties.

City Government Contributed to Maintaining this Nuisance Property

The reason Asprient can use its Downtown properties (Art Lofts, 315 Lofts, Bell Lofts, Ely Walker) irresponsibly as unregulated STRs is because the City has no law that regulates STR's. Prior to 2018, pursuant to Ordinance 66787, the City's Licensed Facility law regulated "hotels" of less than 60 rooms and required that they comply with a plat and petition process to secure neighborhood consent; it also created a protest petition process to terminate detrimental licensed facilities. However, after STRs like Airbnb and VRBO became popular around 2016, the City decided (in 2018) that it would remove hotels (including STRs) from the definition of Licensed Facilities but didn't put any replacement law in place, thus leaving STRs entirely unregulated. This has directly resulted in the nuisance and chaos at Ely Walker and other apartment properties Downtown. Five years later, the City has still failed to pass an ordinance regulating Licensed Facilities.

While the city used the public nuisance law to enter into a consent agreement with Citywide on two separate occasions due to the myriad problems within the building, they did so without holding a public hearing so that individual owners, tenants, and community members could present evidence about the failure to fulfill the requirements of the consent decree by the Condominium Association.

While the City Did "Enforce" its Nuisance Law, Nothing Substantive Improved

Ely Walker is a situation in which the City did start a process under its public nuisance law in 2022 (given there was no other tool available to mitigate the situation), after extensive media

coverage pushed it into action, which resulted in a consent decree in September 2022. However, the requirements of the consent decree were completely inadequate to address the nuisance – there were two shootings at Ely Walker in the spring of 2023, after the consent decree was entered into. This nuisance property continues to threaten the health and safety of those who reside at the Ely Walker Lofts and in the neighborhood generally, and the City has been unwilling to take the necessary steps to fully abate this nuisance.

VI. Recommendations

1. **Pressure City government to enforce municipal laws and regulations.** Communities across the entire City should pressure City Hall and their aldermen to improve the City’s enforcement of existing municipal laws and regulations, whether the Zoning Code, Building Code, Excise Code and any other City regulatory regime. To the extent a law or regulation results in unfair or problematic policy outcomes, this should be addressed via the legislative process rather than non-transparent non-enforcement of existing laws and regulations
2. **Civic and Citizen Groups Should More Aggressively Address Nuisance Properties.** Diligently work with Aldermen and the Neighborhood Improvement Specialist to identify nuisance properties that are a source of social disorder and lawlessness. Develop a thorough record by tracking issues and calls for service to the police. Persistently urge city government and the Downtown Community Improvement District to address nuisance properties by engaging the property owner, and, if necessary, take steps to close offending establishments using zoning actions, building code violations, licensed facility violations and other regulatory actions
3. **If Necessary, Litigate to Compel Action.** Litigation is sometimes necessary to compel a property owner and the City to take action to abate the problems caused by a nuisance property. Establish a legal fund to pay for legal expenses. Act swiftly to keep a nuisance property from continuing to be a nuisance in the long term.
4. **Regulate Short-Term Rentals.** Large parties and other disruptive behaviors connected with short-term rental properties have been a source of disruptive and criminal behavior. Enact legislation to limit the number and use of short-term rental properties. Work with landlords to reduce short term rentals based upon long term plans for increasing rental rates and occupancy.
5. **Address Drug Dealing and Other Disruptive/Illegal Behavior.** Sale and use of illegal drugs is taking place in residential properties in Downtown. Identify known drug dealers and press property owners, management companies, SLMPD, Aldermen, and the Neighborhood Improvement Specialist to evict known drug dealers from residential units. Create a record and document illegal activity. Notify building management and owners of illegal activity occurring on their properties and hold them accountable for those activities taking place on their properties. Establish an apartment managers association that tracks drug dealers evicted from Downtown apartments. Keep an active list of evicted drug dealers and obtain commitments from apartment managers that they won’t rent to individuals evicted from other apartment complexes.

6. **Engage the Community.**

Too many property owners or residents do not know what to do when they have identified these offensive activities. Organize property owners, offer guidance on how to combat these issues, and connect them to legal services. Organize residents to attend court hearings, as is done in some city neighborhoods, to make sure prosecutors pursue charges against offenders. If it becomes known that illegal activities in buildings downtown will result in vigorous prosecution with an engaged group of residents and property owners, it will reduce such activities. If inattentive property owners know the community is engaged they will respond more vigorously.

7. **Engage Landlords.**

Certain properties are disproportionately likely to attract nuisance tenants, such as the Reign space (very large and hard to subdivide) and former convenience stores (which are easily turned back into new convenience stores). Proactively engage property owners with such spaces and help them identify alternative tenancies or ways to remediate their spaces to attract non-nuisance tenancies.

8. **Create an Interagency Task Force in City Government.**

The City of St. Louis should create an interagency task force comprised of SLMPD, Excise Division, Building Commission, Board of Public Service, the City Counselor, and other relevant agencies to identify nuisance properties and coordinate various regulatory, law enforcement, and legal resources to abate nuisances.