



**Saint Anthony Park Community Council Appeal of SPR File # 19-075478
Proposed Rohn Industries development at 2495 Kasota Avenue
October 22, 2019**

My name is Kathryn Murray and I am the Executive Director of the St. Anthony Park Community Council, District 12. As staff for a district council, it is my job to work toward building the vision of the community as put forth by its representatives, and raising the voices of the community.

As part of our grounds for filing this appeal, under *item 6a District Council*, the conditional approval does not acknowledge the fact that District 12 staff provided comments on the long history of this site as a brownfield, our transportation concerns, and more, and these concerns were not included in the conditional approval. One of the three letters sent on behalf of the District Council was provided prior to the granting of conditional approval but, to our knowledge, was not included in the initial packet.

We have yet to hear directly from the developers. Had they taken the time to present to the District Council at all, they would have learned about the time and care by community volunteers, and funds that have been granted to the us over the years to restore the native shoreline, increase water quality, and maintain and improve the natural habitat of the Kasota Ponds.

I have the pleasure of working with the elected board and committee members you will hear from today. These stewards of the community come from many different walks of life; yet our community has the fortune to have an Environment Committee made up of experts, including two former MWMO Commissioners in its ranks. Their bios are in the materials we submitted in writing.

Please, listen to the community, listen to these experts, and revoke approval for this development. If the site is disturbed, there is a high risk that it will affect the health, safety, and welfare of our neighborhood, surrounding communities, and local workers, and will damage the remaining wetland area.

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The Saint Anthony Park Community Council (SAPCC) appeals the conditional approval granted to this project on procedural, environmental, ecological, and transportation-related grounds. Our understanding is that conditional approval is given to projects that have a few minor details left to work out. We maintain that there are more than “a few minor details” that characterize the proposed Rohn project at 2495 Kasota Avenue and its approval by Saint Paul DSI.

As background: The Environment Committee of the Saint Anthony Park Community Council (SAPCC EC) has a 30+ year history of community engagement in this Kasota Pond area. Many of our current and past members and volunteers are environmental professionals, researchers and educators and include University of Minnesota faculty, a former USDA research soil scientist, a landscape architect, an aquatic entomologist, a hydrologist, a water quality consultant, and other specialists. Two current members and another former member have served as Commissioners representing the City of Saint Paul on the Mississippi Watershed Management Organization (MWMO). *(See appendix for brief bios of members.)*

In the mid-1990s BP Amoco filed to develop this site and was issued a permit by the City of Saint Paul Planning Commission without informing SAPCC. Members of the SAPCC EC, through their professional expertise cited above, undertook a full document review. SAPCC filed an appeal based on multiple environmental concerns, resulting in a well-attended public hearing in Council Chambers. At the hearing, Council voted to revoke the permit and BP Amoco withdrew the permit application. Now, nearly 25 years later, the Department of Safety and Inspections has conditionally approved a permit to develop the same site, without consulting SAPCC. The SAPCC EC has again reviewed available documentation and the site plan, and taking into account neighborhood concerns, opposes this development.

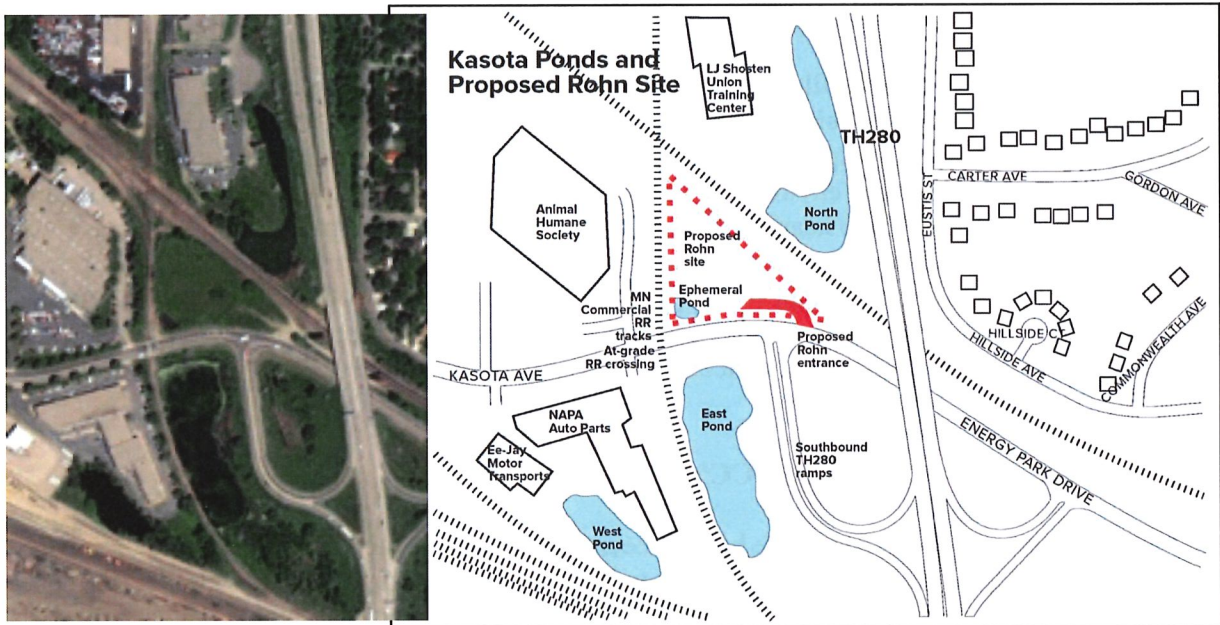
Summary of the grounds for SAPCC’s opposition:

1. **Procedural:** This dump site has not been adequately characterized to provide the knowledge needed to determine risk to humans, the environment, and wildlife. The tremendous variability in characteristics of the fill has been highlighted in every set of tests done on the site since the late 1970s, but current sampling has been remarkably inadequate. In addition, it will be impossible for contractors to fulfill MPCA notification requirements because there are no visible characteristics of the fill that indicate presence of excessive amounts of hazardous metal or nonvolatile contaminants, so the risk of moving toxic levels of contaminants is high.
2. **Environmental:** Vegetation removal and soil disturbance greatly increase the risk of pollutant release via wind erosion, increased water leaching to groundwater, and storm water runoff into the ponds or via storm sewers to the Mississippi River. While some agencies have stated that this threat is not a concern, their decisions were based on

inadequate sampling, sample preparation, and sample analysis. Higher frequency of storms with heavy rainfall and high winds increases the risk of pollutants moving off-site.

3. **Ecological.** Development of this site, which is part of the Mississippi Flyway, will reduce and possibly degrade habitat for wildlife. This will be due to loss of vegetated area, night-time lighting, noise, and increased traffic, plus potential contamination of pond water. In addition, disturbance and reconfiguring the wetland in the southwest corner will destroy its current habitat value.
4. **Transportation.** The planned driveway entrance is within the 100-foot distance required by MnDOT for the TH280 ramps across the street and is within 450 feet of a railroad crossing and two opposing parking lot entrances. In its comments, MnDOT recommended the City require a traffic study to understand how the project would affect vehicle movements and road usage. This has not been completed. We are concerned about bicyclist and driver safety on this stretch of road.

The setting



Below is detailed information on each of these summary areas.

1. Procedural grounds

Contamination at the site has not been adequately characterized

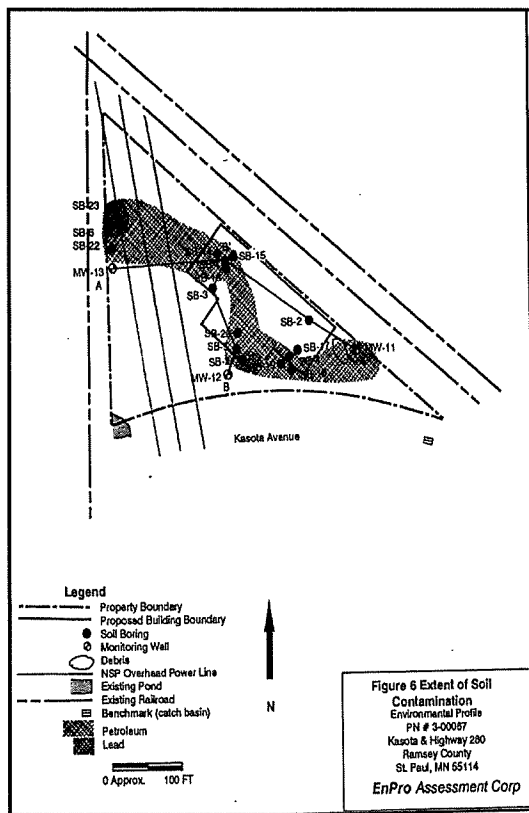
In agricultural situations, soil scientists and agricultural extension agents recommend that farmers or their consultants obtain representative soil samples for nutrient analysis. Based on years of University and Federal research, the Natural Resources and Conservation Service recommends that a large number of samples be taken.

“A critical step in obtaining accurate soil tests is collecting representative samples in the field. Typically, uniform fields should be sampled in a simple

random pattern across the field collecting at least 15-20 equal size soil cores... Fields with significant landscape or other differences should be divided into separate sample areas. Differences may include soil types, slope, degree of erosion, drainage, crop and/or manure history, or other factors that may influence soil nutrient levels... More intensive sampling should be used where detailed information about within field nutrient variability is needed.” (USDA-NRCS, Sampling Soils for Nutrient Management, MT 04/07).

Natural soils have variable composition due to the factors that influenced their development. As the NRCS realizes, management of the soil can result in much more variable nutrient levels, and this should be considered when fertilizer or manure application rates are being calculated.

In any dump there will be an even wider variation in composition across the area and in depth than in natural soil. Because this site apparently received materials from a variety of uncontrolled sources (municipal incinerator ash—mainly coal ash), material from the railroads, construction debris, barrels and containers with unspecified contents, etc.), the variation in contaminant levels is extremely wide. Much more thorough sampling will be required in this urban area.



This variation was recognized in the Final Phase I ESA report (1977, p. 716):

“Conditions between and around borings may vary, and interpolation or extrapolation of results is not warranted.”

And in the Final Phase I ESA (1996, p.519), Braun Intertec stated:

“Often, variations occur between these borings, the nature and extent of which do not become evident until additional exploration or construction is conducted.”

An example is the estimated pattern of petroleum contamination and three distinct sites of lead contamination in this map, submitted in 1996 by EnPro Assessment Corp (p.587, Final Phase I ESA).

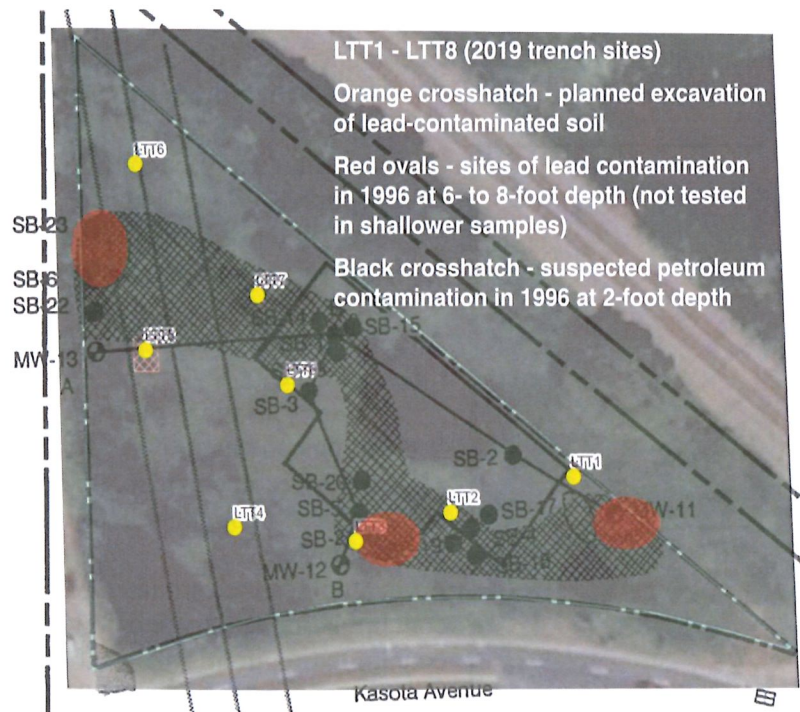
During the Limited Phase II Investigation in 2019 (Voluntary Response Action Plan), Braun Intertec had eight trenches (referred to as “test pits” by Braun) dug on the site, no closer than about 50 feet apart, and they also took six soil borings to depths of 25 to 80 feet. Such sampling is appropriate for their

stated purpose: “The purpose of our evaluation was to characterize subsurface geologic conditions at selected exploration locations, evaluate their impact and provide recommendations for use in the design and construction of the proposed parking lot.” (p. 3 of their report; p. 39 of the Limited Phase II Environmental Investigation report; emphasis added by SAPCC).

However, such sampling makes it highly likely that the site was inadequately characterized with regard to the level of contamination at the site. Lead concentration at only one site (LTT5) exceeded the Industrial Soil Reference Value (ISRV), so a second set of hand-augered samples was taken at two distances (roughly 8 and 12 feet away from the trench) in four directions. Lead exceeded the ISRV in only one of five of those borings (surprisingly, three were not analyzed).

One interpretation of these results is that there is only one “Hot Spot” of lead contamination at the site. We disagree with this conclusion, however, because even without the EnPro data mapped above, a more scientifically and statistically valid interpretation is quite the opposite — their sampling design demonstrated that **this one “Hot Spot” would have been missed had the original trench been dug only 8 feet away** to the East, West, or North of the site that the personnel selected.

Similarly, the site identified by Landmark Environmental was not found by EnPro. Therefore,

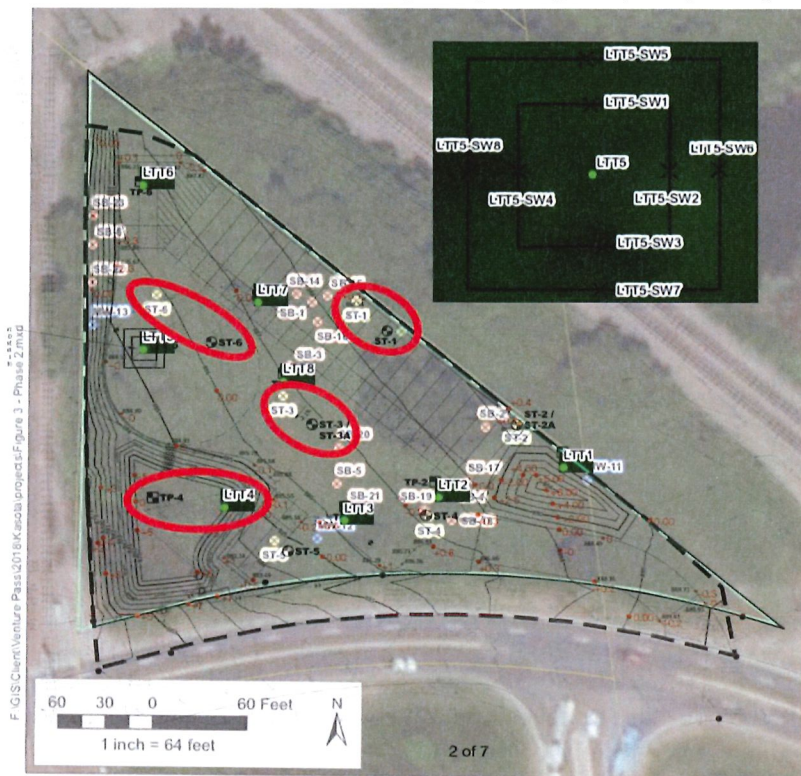


the sampling conducted thus far on this highly variable, demonstrably contaminated site, has been inadequate. In this composite map from the EnPro report and the Final VRAP report by Landmark Environmental, it is clear that Landmark Environmental paid inadequate attention to previous soil coring campaigns, at least with regard to lead contamination. They wrote:

“Lead impacts to soil exceeded 1996 screening criteria (MPCA Tanks and Emergency Response action limits for land farming of petroleum) at four locations, MW-11, SB-21, SB-6, and SB-23. Only one of these detections, 1,300 mg/kg at MW-11, exceeds current MPCA screening criteria for an industrial setting.” (p. 13, Phase I Environmental Site Assessment, 2019).

Why did they not sample the area near MW-11, where they knew lead was present at excessive levels only two decades before?

As we worked with the maps in the various reports, there were discrepancies with the mapped locations of borings and one trench. On the map provided by Braun Intertec (p. 55 of Limited Phase II Environmental Investigation), test pit 4 (TP-4) was positioned about 45 feet to the west



of where Landmark Environmental placed trench LTT4 (Figure 2, p. 19 of the same report). There were major discrepancies in the mapped location of the borings, too: ST-6 was mapped by Braun Intertec about 45 feet SE of the location mapped by Landmark, and Braun mapped both ST-1 and ST-3 were mapped about 26 feet SE of the locations shown by Landmark in the same figures cited above. This raises serious questions about the reliability of reports about the site received by the MPCA.

In addition, more samples were collected than were analyzed, both with respect to

location on the land surface and depth. Four of the original trenches were sampled at 0 to 2 feet (LTT3, 5, 6, and 8), one at 1 to 2 feet (LTT1), one at 2 to 3 feet (LTT2), and two and 2 to 4 feet (LTT4 and 7). They provided no justification for this variation in sampling depth.

“The Investigation focused on assessing soil and characterizing fill material across the Property.” (p. 8, Limited Phase II Environmental Investigation).

How is this sampling protocol supposed to have met their objective? They also failed to analyze three of the samples collected around the trench with very high lead concentrations—a lost opportunity to gain knowledge of spatial variability at the site.

It is clear that inadequate sampling impairs our knowledge of where lead contamination is of concern, but this inadequacy applies to all toxic compounds of concern to the health of humans and ecological systems. Coal dust and ash are well-recognized as containing elements and compounds hazardous to human health. Because the sources of each element and compound differed, as did the time and location of their addition to the site, the presence and concentration of these toxins cannot be assessed with so few sampling locations.

This lack of appropriate sampling and analysis clearly affects whether MPCA and other agencies, such as the Minnesota Department of Health, could accurately assess the risk of development on this site.

No evaluation of petroleum contamination

Petroleum contamination has been identified at the site. At the end of the third paragraph in the “No Association Determination” letter from Supervisor Amy Hاديaris (September 10, 2019), she stated:

“For the purpose of this letter the identified release consists of lead, arsenic, mercury, chromium, PAHs, PCBs, and TCE in soil (Identified Release). This letter does not address petroleum-related contaminants. Petroleum contamination detected at the Site is under the oversight of the MPCA’s Petroleum Brownfield Program.”

We have seen no documentation that the MPCA Petroleum Brownfield Program has taken a position on the plans for this site. The widespread occurrence of diesel range organics in near-surface samples at the site warrant attention by the Program, but again, sampling frequency across the site is inadequate for staff to make informed decisions.

It is impossible for the developers to adhere to MPCA requirements

The “No Association Determination” letter from Supervisor Amy Hاديaris (September 10, 2019), contains this statement:

“In the event that any suspected hazardous substances are encountered during Site activities (i.e., grading, excavation, etc.), the Parties shall notify the MPCA project staff immediately in order to determine appropriate handling, sampling, analysis, and disposal of such wastes.”

Landmark Environmental described the expected response to odors or construction debris that might carry asbestos (Environmental Construction Contingency Plan, 2019), but not lead or other metals. From the descriptions of the borings and trenches, the mixed fill is dark brown to black in color and there were no reports that concentrations of hazardous metals or nonvolatile organics are related in any manner to the presence of visibly recognizable materials (wood, concrete, cinders, plastic, glass, etc.) or to changes in the color, texture, moisture content, or any other characteristic of the fill that would be easy to recognize during earth moving.

How, then, is it possible that the people conducting the “site activities” could recognize that they have encountered subsurface materials containing high concentrations of hazardous metals or organic compounds? Without visible clues to the presence of contaminants, even experts would be stymied. It is clear, then, that the risk that these contaminants will be displaced on site and exposed to loss by wind or water erosion is highly elevated, as is the risk to worker health.

2. Environmental grounds

Designing adequate controls of runoff

In the letter from Hاديaris cited above, MnDOT expressed concern and set requirements about drainage from the Rohn site to adjacent MnDOT land. Given SAPCC EC members’ knowledge of the water table in this area and infiltration as it exists presently, we do not see how these MnDOT requirements can be met:

“A MnDOT drainage permit will be required for this site to ensure that current drainage rates to MnDOT right-of-way will not be increased. Please provide

computations and plans so that MnDOT may verify that the proposed development maintains or reduces drainage rates to the state right-of-way.”

MnDOT specifically listed multiple requirements, including “drainage computations for pre- and post-construction conditions during the 2-, 10-, 50-, and 100-year rain events.” These should be based on the most recent NOAA ATLAS 14 Point Precipitation Frequency Estimates. The frequency with which these are expected to occur is the same, regardless of previous large rainfall events in the same year. As is generally recognized, two effects of climate change in Minnesota are increased frequency and intensity of large rain events. Larger storms imply stronger winds. Although NOAA and other Federal agencies are examining ways to include the effects of climate change in the estimates, ATLAS estimates currently assume stable climate. Consequently, we recommend the designers consider the upper bound of the 90% confidence interval, rather than the mean precipitation level when designing storm water runoff collection.

These considerations relate both to runoff onto MnDOT right-of-way, and to the likelihood of runoff during site development. Movement of contaminants off-site due to wind and/or water erosion is best controlled by good soil cover, as is currently the case on this site except where disturbance has occurred. If this development proceeds, vegetation on the site will be removed before or during grading and excavation, and it will require at least two years to recover. This heavy traffic will pulverize the soil and expose the surface to sunlight and wind, which dry the soil rapidly. It is these small particles that are most easily moved off-site by water and wind.

Little things can have big impacts

Particles smaller than 100 microns (the typical thickness of photocopy or printer paper) can be suspended in air and travel great distances. When not present in their original waste material, it is well established that toxic metal contaminants are concentrated in clay-sized soil particles. For example, 72% of the lead contaminating soil at a firing range was in particles less than 74 microns in size (2012, p. 15, Interstate Technology & Regulatory Council, bit.ly/ITRCsampling). The USEPA recognized this partitioning of lead to small particles and issued a Directive in 2016 to sieve soil less than 150 microns before analysis to assess the risk of dust adhesion on hands at lead contaminated sites (OLEM Directive 9200.1-128, bit.ly/EPAsieve4lead). Because this site is contaminated by lead, construction activities will elevate the risk of human exposure to lead by inhalation or ingestion at least to workers at the site, if not to people working and living downwind or downgradient.

Applying the results of the ITRC report to this site, let us assume the lead concentration of the entire site is represented by the average of every sample analyzed by Landmark Environmental and reported in Table 2 of their 2019 Voluntary Response Action Plan, (13 samples, 392 mg lead/kg soil – less than the Industrial Soil Reference Value). Applying the 72% figure from the ITRC report above, **if particles smaller than 100 microns represent 10, 15, or 20% of the weight of the fill, they would have lead concentrations of 3210, 2140, or 1610 mg/kg, respectively – all exceeding the Industrial Soil Reference Value by a factor of 2 to more than 4!** Larger particles, less likely to be moved by wind, would contain only 139, 147, or 156 mg/kg, respectively – less than or about one-half the Residential Soil Reference Value. Analysis of the entire sample obscures the hazard to humans and the ecosystem.

Erosion of soil particles by storm water raises the risk that nearby water bodies will be impacted. As described below, contaminants in such runoff likely would damage these fragile ecosystems. Dissolved constituents move the furthest and the small particles, such as clays or fine ash, move further than silts, which move further than sands. Therefore, concerns about off-site movement of lead and other contaminants is similar as described for wind.

Loss by subsurface flow

In addition, from the time the vegetation is removed before land shaping until the remaining permeable surfaces are revegetated and that vegetation is transpiring significant amounts of water—two or more years— more rainfall will be absorbed by the fill and more will percolate through to the perched water table. This drainage water will carry soluble chemicals and very small organically or mineral-bound contaminants. Contaminants in ground water also can affect surface water. According to our discussions with staff at the MWMO, it is likely that the perched water table contributes water directly to the East and West Ponds. In addition, water collected by storm sewers could carry these contaminants directly to the Mississippi River.

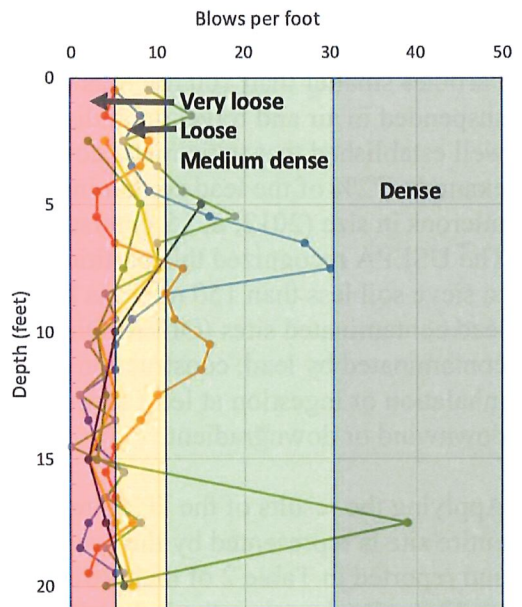
Will the fill at this site provide stable support?

Several proposals have been made to develop this site over the past 40 years, but none has been undertaken. It is remarkable that two separate engineering assessments of the site concluded that the highly variable density of dump materials would require substantial efforts to overcome in developing the site. Braun Intertec’s analysis for the proposed development as a semi-trailer parking lot also addressed this issue.

This graph of data from the soil borings reported in the Limited Phase II Environmental Investigation (p. 64-75) shows that, in every sampled location, there are layers or pockets of very loose material that may become compacted over time when additional weight is added above them. This will result in subsidence of the surface that will potentially damage the concrete and asphalt layers. The apparent relative density descriptions in the graph are based on p. 76 of this report. Braun Intertec stated that:

“...much of the soils on this site are moisture sensitive, and it is likely that some moisture conditioning (wetting or drying) will be necessary to reuse the on-site soils as compacted backfill.” (p. 7, Braun Intertec report in the Limited Phase II Environmental Investigation).

Although disturbed materials can be dried or wetted as necessary, it seems unlikely that compaction of underlying material will be adequate if moisture levels are not within the necessary range for optimal compression. In addition, if more fill needs to be removed because it cannot be adequately compressed, the material should be thoroughly tested for contaminants. Because the level of toxic contaminants cannot be assessed without specialized equipment in the field, the contractor should not be allowed to remove it at their discretion.



Given the greater vulnerability during these activities, will the fill continue to settle, causing structural failure of the parking lot surface? Failure would compromise storm water management on the site and increase the threat of contaminant movement.

3. Ecological fragility grounds

Since at least 1985, SAPCC EC has organized annual cleanups, habitat restoration, bird and turtle counts, water-quality monitoring, and other activities at Kasota Ponds. We have been awarded grants from the Minnesota DNR, Saint Anthony Park Foundation, Tree Trust, and MWMO to carry out species inventories, restore shoreline habitat, install nesting boxes, monitor water quality, and do public education. Considerable public and private resources have been invested on the four pond remnants near Kasota Avenue, and many hundreds (perhaps thousands) of local residents have participated in these activities since the 1980s.

The proposed Rohn development rests between the four Kasota pond remnants, fragments of a much larger pond/wetland system spanning Northeast Minneapolis, Lauderdale and Saint Paul before it was drained, filled, and developed. A historic natural spring (Skonard Spring) is adjacent to the southwest corner of the proposed development. The spring once recharged the East Pond, but in recent years has been piped underground and is no longer visible.

The ponds and surrounding land are part of the Mississippi Flyway, which supports millions of migratory birds twice each year. The ponds are a resting point in spring and fall for wading birds, waterfowl, shorebirds, warblers, songbirds, and others. Many birds nest and reproduce there, including warblers, swallows and swifts, herons, and wood ducks. Until recently resident species included yellow-headed blackbirds, whip-poor-wills, kingfishers, American bitterns and others that are very rare today in a fully developed urban core. Of note, a new Cornell University study shows that bird populations have declined by about 30% since the 1970s due to habitat loss and pollution. (“Decline of the North American Avifauna,” K. Rosenberg et al., *Science* 366:120-124.)

Other species identified at the site include fish, aquatic insects, pocket mussels, salamanders, fairy shrimp, and three species of turtles (painted, snapping, and western spiny soft-shelled). Local residents from both Minneapolis and Saint Paul highly value the ponds and vicinity for bird watching, cross-country skiing and snowshoeing in winter, nature viewing, photography, and other activities.

On the southwest corner of the proposed development, the ephemeral pond or wetland has the highest aquatic insect diversity of all four Kasota pond fragments and is also a small nesting habitat for neotropical migratory birds. Mechanical disturbance and runoff to this pond will destroy its habitat value. It is crucial that it not be reconfigured. No deep soil borings have been taken near it, so we do not know whether it represents an older landscape feature.

Loss of vegetation from two thirds of the site to asphalt and concrete clearly will reduce food supply and nesting sites for several bird species. If storm water runoff, wind erosion, or subsurface flow of contaminants from this site enter one or more of the ponds, elevated levels of

pollutants may reverse the recover we have seen over the past three decades. We understand that ecological risk assessment usually is not required by MPCA when the intended use of a contaminated site is for parking. This site represents a special case, however, and we request that ecological risk assessment be completed.

Additionally, we are very concerned about increased noise, traffic, and night-time light pollution that will likely impact avian migration and normal activities of terrestrial and aquatic animals, contributing to further decline of species.

4. Transportation grounds

Aside from the site's historical pollution problems and how those would be managed if the site is developed as proposed, it has multiple problems because of its location on Kasota and relative to other properties and thoroughfares. The proposed entrance to the site is located across from on and off ramps to TH280 and is within 450 feet of a railroad crossing and two opposing parking lot entrances to the west.

As identified by Public Works Construction in the conditional approval, the driveway entrance specified in the site plans is well within 100 feet of the intersection with the TH280 ramp terminal, which defies MnDOT parameters. Changing this would, at a minimum, require moving the entrance to the west side of the Rohn project site, but that raises several other potential problems, both spatially within the site and on Kasota, such as trucks stopping on the Minnesota Commercial railroad tracks when queuing left turns from eastbound Kasota. SAPCC believes this combination of problems alone is enough to overturn the conditional approval and go back to the drawing board on the site plan.

MnDOT specifically emphasized this problem with the site in its letter attached to the conditional approval (addressed to Amanda Smith, Zoning Inspector, August 30, 2019). They recommended the city:

“require a traffic impact study to provide adequate information on the number and distribution of heavy vehicle trips that will be using city, county, and MnDOT roads, as well as the expected ramps and intersections where these heavy vehicles will be accessing the MnDOT highway network...”

This request is similar to that by Public Works to know the frequency of trips that will be generated by the site and how access and departure from the site will work, and whether MnDOT right-of-way will be utilized.

We learned on Monday, October 21, that MnDOT has withdrawn this requirement. We have not seen evidence of the information that satisfied MnDOT's initial concern, and we maintain that there is a need for detailed review of traffic impacts.

The MnDOT letter of August 30 continued,

“A lead concern is the fact that access is proposed via a single driveway at a skewed angle on the north side of Kasota Avenue that is also offset 20-30 ft to the east from the existing “T” intersection ramps to/from MN 280. Also of concern are potential congestion and backups on Kasota Avenue related to the at-grade

railroad crossing to the east [sic: should be west].”

All of these requirements and problems were ignored in issuing the conditional approval.

And a final question: *Does the intended use comply with Saint Paul Zoning Code?*

There is an additional question we don't believe was asked during the review process: Will the trailers be parked on the site for at least five days? This is necessary to meet the definition of “outdoor storage” of vehicles under I1 Zoning. If they will be there for less than five days, it does not qualify as outdoor storage. Who will monitor this use?

Thank you for hearing our appeal of the conditional approval of the Rohn Industries project at 2495 Kasota Avenue. We believe we have demonstrated that there is substantial evidence to support overturning this conditional approval.

Appendix: SAPCC presenter bios

Karlynn Eckman, PhD, is an adjunct member of three graduate programs at the University of Minnesota: Water Resources Science, Forest Resources, and Natural Resources Science and Management. She is an educator and researcher with 35 years of experience in natural resources management and research in Africa, Asia, the Caribbean, and North America. Areas of expertise include vulnerability and risk assessment; community forestry; agroforestry; flood hydrology; and evaluation research. A long-time member of the Saint Anthony Park Community Council's Environment Committee, she also served for 10 years as the Saint Paul Commissioner on the Mississippi Watershed Management Organization. Dr. Eckman has worked on improving the terrestrial and aquatic habitat at Kasota Ponds for several decades.

Stephen Mastey, ASLA, CLARB, LEED AP, is an award-winning Landscape Architect with 20 years of wide-ranging public and private sector experience. A driving factor in all of his work is blending ecologically appropriate design solution into a cultured landscape. He is co-chair of the Saint Anthony Park Community Council's Environment Committee and has led several remediation projects at Kasota Ponds.

Michael Russelle, PhD, is an Adjunct Professor in the Department of Soil, Water, and Climate at the University of Minnesota with nearly 40 years of experience in agricultural and environmental research. During much of this time he was a Research Soil Scientist for the USDA-Agricultural Research Service. He is a co-chair of the board of Saint Anthony Park Community Council and co-chair of its Environment Committee.

Betty Wheeler, PG with an MS in groundwater geology, is a former college teacher in environmental science and hydrologist for the Minnesota Department of Health and the Earth Science Department at the University of Minnesota. She has five years of experience reviewing Environmental Assessment Worksheets, Environmental Impact Statements, and County Water Plans. She is a member of the Environment and Transportation Committees of the Saint Anthony Park Community Council. She also was appointed as the Saint Paul Commissioner on the Mississippi Watershed Management Organization.