St. Anthony Park Community Council/District 12 2395 University Avenue West, Suite 300E Saint Paul, MN 55114



To: Environment Quality Board 300 Centennial Building 658 Cedar Street St. Paul, MN 55155

November 25, 2019

Re: Application of Rohn Industries for Site Plan Approval for 2495 Kasota Avenue, St. Paul, Minnesota

Dear Sir or Madam:

Enclosed for filing is a Petition for Environmental Assessment Worksheet signed by myself. I represent the District 12 Board and the residents of St. Anthony Park, St. Paul, Minnesota in this matter. Documents to demonstrate significant environmental effects are attached, and signatures of SAP residents are included, as well as a copy of the notice of this request sent to the Proposer.

Please let me know if you have any questions or require any additional information to process this Petition.

Thank you for your consideration.

Sincerely,

Kathryn Murray, Executive Director kathryn@sapcc.org | 651-649-5992

Lathryn Murray

www.sapcc.org

cc: Matt Privatsky, Ward 4 Council Aide

ENVIRONMENTAL QUALITY BOARD

In Re: Application of Rohn Industries, for Site Plan Approval for 2495 Kasota Avenue, St. Paul, Minnesota

PETITION FOR ENVIRONMENTAL ASSESSMENT WORKSHEET

TO: Environmental Quality Board, 300 Centennial Building, 658 Cedar Street, St. Paul, MN 55155

PLEASE TAKE NOTICE that, pursuant to Minnesota Statutes § 116D.04, subd. 2a(e), Petitioner's Representative, Kathryn Murray, Executive Director of the St. Anthony Park Community Council (SAPCC) hereby requests the preparation of an Environmental Assessment Worksheet by the appropriate responsible government unit, as determined by the Environmental Quality Board with respect to the above-entitled proceeding.

PROJECT DESCRIPTION

Venture Pass Partners, LLC, on behalf of Rohn Industries ("the Proposer") has filed an application with the City of Saint Paul for site plan approval ("the Proposal") for the establishment of a parking lot for semi-trailers ("the Project") on the real property located at 2495 Kasota Avenue, Saint Paul, Minnesota ("the Property"). The Project is located on the site of an old uncontrolled dump site (part of the "Elm Street Ash Dump"), is the site of a historical wetland (later partially in-filled), and is within one half mile of at least 85 residential and 15 business properties.

PROJECT PROPOSER

The Proposer of the Project is Venture Pass Partners, LLC on behalf of Rohn Industries, 862 Hersey Street, St. Paul, Minnesota, 55114. The Project Name is "Rohn Industries Trailer Storage."

PETITIONERS' REPRESENTATIVE

The Petitioners' Representative is Kathryn Murray, Executive Director of, and on behalf of, the St. Anthony Park Community Council (SAPCC). The address of the SAPCC is 2395 University Avenue, West, Suite 300-E, St. Paul, Minnesota 55114 and her telephone number is: (651) 649-5992. The Project is proposed within the St. Anthony Park neighborhood, in the northwestern part of the city of St. Paul.

PROJECT'S POTENTIAL ENVIRONMENTAL EFFECTS

The Project involves the construction of a semi-trailer parking lot, to serve as accessory outdoor storage, and the alteration of an existing wetland to function as a storm water runoff pond. Rohn Industries is an indoor recycling process center, located at 862 Hersey Street. The Project has received conditional approvals by the St. Paul Planning Commission and the Minnesota Pollution Control Agency (the MPCA), and has received a statement from the Minnesota Department of Health (MDH) suggesting they anticipate minimal health-related effects from the project. However, it is the position of the Petitioners' Representative that the Project actually poses a potential for significant environmental effects in at least five respects.

First, this plan has the potential to degrade air quality for the nearby neighborhood, and quite likely could present serious health effects (especially during construction) to the on-site workers and their families. Approval of the plan would violate the city's goal of protecting adjacent and neighboring properties through reasonable provision for maintaining on-site surface water drainage, air quality, sound and sight buffers, views and light, and those aspects of design which may have substantial effects on neighboring land uses.

The applicant's consultants have not characterized this site adequately, particularly because this was an uncontrolled dump for decades in the mid-20th century and was not adequately sampled in regard to the heterogeneity of the wastes. Those wastes occur at, and/or within one foot of, the ground surface, and range to depths of between 16 feet and 22 feet.

The lack of sample differentiation of the components of fine particles was a very serious omission, which made adequate review by state agencies impossible. Those agency personnel could not determine the real risks for airborne contamination, particularly for fine particles of lead. (Whole volume samples identified lead in essentially every sample taken on this site.)

There are likely other serious contaminants in the fine particle sizes which could be mobilized by wind, possibly even asbestos, which notably was never analyzed for. Fine friable asbestos simply cannot be identified in the field, but must be analyzed by laboratory methods. Also, soil and debris removed from any site, including this one, is not allowed to be re-used elsewhere as fill, under the MPCA's requirements (as included in the Proposer's "Environmental Construction Contingency Plan", p. 44) if it contains any asbestos. If the Proposer is allowed to never analyze for asbestos, then this requirement simply cannot be enforced.

A requirement of the MPCA is that work will stop and reporting would be required when hazardous material is encountered and recognized. Certainly, none of the toxic metals already confirmed in samples would ever be identified by sight or smell in the field by any personnel (even by qualified scientists) because these types of fine particles can neither be seen nor smelled.

The MPCA has recently communicated to the SAPCC by email that the contractors for the Proposer will use X-Ray Fluorescence (XRF) for field testing during construction. Notably, this requirement is only in effect after construction begins. Thus, such testing will occur only after significantly disturbing the fill by excavation. By that time, the contaminated debris will already have been partially exposed at the surface to wind. Therefore, whatever fines could be mobilized from the shallowest first excavations may already be airborne. Much more intensive sampling before any site disturbance is needed to protect workers, as well as nearby residents and businesses.

Another document which was overlooked is a 1995 internal memo found within the MPCA's online files, which is in regard to a review of a previous proposal on this site. That memo (attached)

demonstrates the concern that MPCA's reviewers had for the health and safety of on-site workers (specifically for drillers for proposed monitoring wells and/or soil borings to be installed during that project), due to the toxic nature of the wastes that workers would unavoidably contact. For this Project, the contractors who will operate heavy equipment (backhoes, excavators, bobcats, etc., dump trucks and so forth), as well as installers for lighting and fencing will have similar direct and unavoidable contact with these contaminants, particularly lead.

The MPCA has erred in approving this plan because the consultants' work did not adequately and thoroughly sample the entire area of the dump wastes (especially at the nearest surface depths) which will be unavoidably disturbed. In addition, the MDH's decision to allow the plan to go forward and not add substantial conditions (especially in regard to adverse air quality effects on the neighborhood and risk to on-site workers and their families) was a direct result of the MPCA's faulty evaluation. The very limited conditions, so far imposed by any of the reviewing agencies, will be ineffective in decreasing the potential for dangerous outcomes of this construction project.

Second, this plan will reduce the city's amount of pervious area, thereby adding to storm water runoff and water quality degradation. Approval of the plan would violate the goals of preserving unique geologic, geographic or historically significant characteristics of the city and environmentally sensitive areas. Many important documents were overlooked by the Applicant's consultants that detail the historic watershed, cultural and environmental features of the 2495 Kasota site and its environs. In particular, the on-site wetland remnant was mischaracterized as an 'incidental wetland', again because important documentation was overlooked. Plan approval would also contravene requirements of natural wetlands and anti-degradation standards for water quality.

Third, the St. Paul Planning Commission did not take into consideration the fact that this site is within a wildlife area. Therefore, decisions taken so far violate the city's goal of ensuring that abutting property and/or its occupants will not be unreasonably affected. The plant choices and fencing are all inappropriate for this reality. The added impervious surface, the removal of vegetation, the destruction of

the existing on-site wetland, the disturbance by heavy equipment, the noise and vibrations of on-going traffic of semi-tractors and trailers, the addition of lights at nighttime and the accompanying degradation of air and water quality, will all serve to break up an existing wildlife corridor and inhibit wildlife movements throughout the corridor, isolate this area from a much more extensive habitat, and destroy the existing aquatic ecosystem on this site.

The water quality degradation will also have rippling effects by carrying additional contaminants to the surrounding wetlands, particularly the Kasota East Pond (aka, "Mallard Marsh") and the hydrologically connected Kasota West Pond. The aquatic ecosystems of these ponds will be subsequently degraded as well. The plan's phosphorus removal design is wholly inadequate to the task of addressing the full list of toxic substances within the dump wastes that will be mobilized, not only during construction but on a continuing basis when the stormwater runoff overloads their system.

Fourth, the approval of this plan will contravene requirements to design and properly size the capacity of the storm water system. The site plan for storm water is inadequate, particularly for water storage and retention. Paving an acre will increase runoff to the adjacent ponds and storm sewers, which will further degrade water quality to receiving waters. The city knows that much more intense rainfall events have become significantly more common in the last two decades; yet this plan does not account for 1000-year storm events. As mentioned above, the plan's phosphorus removal design is wholly inadequate for this particular site and its unique historical contamination.

Fifth, the site plan will add to, rather than reduce, the urban heat island effect (which drives climate change) by increasing the amount of heat-trapping materials, such as bituminous and concrete. The plan is inconsistent with the St. Anthony Park Community Plan (in multiple sections), and the site plan, if approved, would make no recognition of the Saint Paul Climate Action and Resilience Plan, which recommends reducing impervious surfaces where possible—not adding to them. The addition of an acre of bituminous and concrete will more than offset the effect of planting a few more trees than currently exist on this vegetated site.

An environmental assessment is necessary and appropriate in light of all of these concerns. The city's own goals are violated (including goals to reduce drivers of climate change), state requirements and standards are not met, there is significant potential for health-related risks, the sensitivity of the existing on-site and nearby ecosystems is ignored by this plan, and the stormwater system is poorly designed and does not address the toxic contaminants that will be mobilized to other surrounding wetlands and habitats.

DOCUMENTS TO DEMONSTRATE SIGNIFICANT ENVIRONMENTAL EFFECTS

(See attached documents)

- 1 SAPCC Appeal of St. Paul's Zoning Resolution 19-54 (File Number #19-088-143), Nov. 1, 2019
- 2 SAPCC Appeal of SPR File #19-075478 (a prior SAPCC appeal to the city), Oct. 22, 2019
- 3 Internal memo between MPCA's reviewers regarding a previous project proposal on this site

WHEREFORE, the undersigned Petitioners respectfully request that the Environmental Quality Board designate the responsible government unit to determine the need for an EAW, and further, that the responsible government unit order the preparation of an EAW based upon the evidence as set forth above that, because of the nature or location of the Project, the Project may have the potential for significant environmental effects.

November 26, 2019

Kathryn Murray, Executive Director St. Anthony Park Community Council 2395 University Avenue West, Suite 300-E St. Paul, MN 55114 (651) 649-5992

STATE OF MINNESOTA)
) ss
COUNTY OF RAMSEY)

KATHRYN MURRY, being first duly sworn on oath, states that she is the Representative of the undersigned Petitioners, that she has read the foregoing Petition for Environmental Assessment Worksheet, and that the same is true of her own knowledge.

Subscribed and sworn to before me this 26 day of November, 2019

Notary Public

MARK F. BUTINA
NOTACY PUBLIC - MINNESOTA
NOTACY PUBLIC - MINNESOTA
Ny Commission Explires Jan. 31, 2023

PETITION SIGNATURES

- This site is environmentally sensitive and supports a wide diversity of organisms.
- Hazardous levels of lead have been identified on this former dump site.
- The site has not been adequately sampled to locate areas requiring remediation.
- Preconstruction site investigation is required because lead cannot be identified by sight or smell during construction.
- Applicants have not determined whether lead is concentrated in fine particles, which are most likely to expose workers, the public, and the ecosystem to this toxin.
- The stormwater system is inadequate to retain and treat runoff water, threatening nearby water bodies.

	Number	Name	Address (Full Street, City, and ZIP Code)	Signature
1	1	Matt Hass	987 Raymond Ave St. Paul MN SS114	MA
2	2	Mickey Chinn	1501 LaSalle Ave, Minneapolis, MN SS403	Mac
3	3	Joeg (Pelner	5509 Part Ave) MP19, MN, 55417	Kut P
4	4	Rachel Williams	987 Raymond Ave St. Paul, MN 55114	Thurs Williams
5	5	Colone Rong A. MURTHY GUINAN	19185 Cleveland are North	Giblie Ruy
6	6	A. MURPHY GUINAN	MPLS, MN (540	alle s
<u>7</u>	7	Taylore Wyatt	Minney 2:1, 55411	TUT
8	8	Galina Dronan	minnersons, MNG540	GulieP
<u>9</u>	9	Alejandra Toba	TO THE TO STORE	atorax
<u>10</u>	10	Molly Glasgow	SEP EVENT ST ST Paul MN SS/03	17/11/

	Number	Name	Address (Full Street, City, and ZIP Code)	Signature
<u>11</u>	11	Kate Wolf	4816 W 114th St Bloom.	Kothyn Woof
<u>12</u>	12	Julianna Weber	Apple Vally 1102 Lowell Orive 55124	Sphi Wale
<u>13</u>	13	Annabel Gragg	1400 Coran Ave MA 55105	Kul Ogg
<u>14</u>	14	Sophie Glassford	2381 Long Ave St. Paul, MN 55114	Del Lafel
<u>15</u>	15	Liliana Rodriguez	24314in 51 whitebear Two MNSSNO	ung
<u>16</u>	16	PAT VAIDOS	190 S Vernon St St. Paul , MN 55105	Pa
<u>17</u>	17	Molly Hopingarne		Milletygen
<u>18</u>	18	Collette Ricci	2285 Univerty Aug. W	The state of the s
<u>19</u>	19. (David MacKonzie	1620 Pengsylvanitus StLais 15/CMNSHZ	
20	20	BETTY WHEELER	HAT DIVUOLET LUE	May Muler
21	21	Richard Marsh	Bethel, ON 55005	Child March
22	22	Emma Ledin	3185 139th LN. Andorer, MN 5530t	Ema Jali
23	2	Divya Goel	3340 Vagabond In N Plymouth, MN 55447	airen In
24	24	Tosieshaw	50112 ROCKELDY VE	josie Thew
25	25	Houa Mona	875 Seal St #500 St. Paul, MN GS114	0
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27	27	Sarah Samorodnitsky	320 7th ST SE, 315 Mpls, MN 55414	Sofr Nethele
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32	32	Keogan McCully	\$ 2323 Standish St. St. Paul MN 55108
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34	34	ElisabathDavis	372 Cleveland Avel 31. Paul MN 55104
35	35	Abhley Boat	Minneapolis, MN 55417
36	36	Kinsey maze	Saint Paul, MN, SSIO4 1775 Thomas are
37	37	Barbara mork	Suran MW 35/04
38	38	Kaylyn Anderson	1699 8m St SE #301 MINNEAPOIS, MN 5544
39	39	Vicole Szajner	Minneapolis, MN 55414 Wil
40	40	Madison dones	MINNEAPOLIS, MN SSAIA
41	41	Paulina Cruz	3044 Columbus Aug. 3. MPLS, MN SS407
42	42	Bryn Manion	St. Paul, MY HS 55108 Buy leice.
43	43	Elizabell Lyht &	2334 Brewster St St Pal MA 55 108 St Pal MA 55 108
44	44	Paplo Villani	er PAUL MIN 55/08 MINERS
45	45	Mitch Kullner	2333 Priscille St. Apt 9 St Paul MN 55708 2421 300 Aus Apt 1844
46	46	Tony Meyer	Marcapaix, MASSAUA CHARLOSO
47	47	Just Royce	MINTERPLES, MN 55484
48	48	Megan Keliner	2333 Prisulla St Apta Sairt Paul, MN 55108 MM M
49	49	Sonia Ehrlich	
50	50	JEANNOY ST. CA	18 2282 Brister & St Claire

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We, the undersigned, live in and/or own property in the state of Minnesota and have concerns about the potential environmental effects of the project titled, Rohn Industries Trailer Parking, 2495 Kasota Ave., and located in Saint Paul, Ramsey County, Minnesota. There is a pending action for the project of a site plan approval to construct a semitrailer parking and storage lot, as more fully described in the attached project description. We request that an Environmental Assessment Worksheet be completed prior to a decision on the site plan. Our request is based on the potential for significant environmental impacts as listed below and fully explained on the attached petition.

- · This site is environmentally sensitive and supports a wide diversity of organisms.
- Hazardous levels of lead have been identified on this former dump site.
- The site has not been adequately sampled to locate areas requiring remediation.
- Preconstruction site investigation is required because lead cannot be identified by sight or smell during construction.
- Applicants have not determined whether lead is concentrated in fine particles, which are most
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- The stormwater system is inadequate to retain and treat runoff water, threatening nearby water hodies

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3	1	PatriciaThompson	Stran MN 55108	Pag 2_
4	2	GreichenWalker	1342 Paymond St Paul Min 55108	Dutcher Walker
5	3	Tim Walker	1342 Raymond AV	XimWan
6	4	Martha Keskinen	2314 Raymond Are, apt. 2 St. Faul, MN 55108	
7	5	NANCY GEHRIG	2265 buther Place #309 57. PAUL, MN 55108	range ou
8	6	Steven Kranz	2378 como Ave 51. Poul, mh 55108	SIK
9	7	Gingerkranz	2378 (como Ave. St. Pail, MN 55108	GARZ
0	8	Leonard Jennings	SI Paul MN 55108	glily).
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2	10	James H. Stout	St. Par DIMN 55108	Michael

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<u>73</u>	1	Ann Marie Stout	2223 Scuddy St. St. Paul, MN55108	and M. Stout
<u>74</u>	2	Many Bred-Brewf	2233 Senditee St. St. Paul MNSS108	Thur This
<u>75</u>	3	Colleen Healy	3228 Doswelling	Collin a. Heil
<u>76</u>	4	Nadine Hotchnen	2161 0050 de ave St Paul MN 55106	H-lee
<u>77</u>	5	Ann E. Sisel	1567 FULHWAST ST PAUL 55108	au Elil
<u>78</u>	6	WAYNEJ, SIGEL	1567 FULLYM ST OF PACK, MR 5588	111/201640
<u>79</u>	7	Helen Foster	2190 Folwell Ave 54 Paul MN 55108	Dilen Brister
<u>80</u>	8	Kaven Williams	211- Otto A Are 11)	Karen Willen
<u>81</u>	9	CLAY WILLIAMS	2167 HAYFAR W St Paris MN 55108	cugo://ii
<u>82</u>	10	CAROLYNWHERMAN	ST. PAUL, NN 35708	Coraly W. Herman

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<u>83</u>	1	VICIORIA ERHANT	1301 (helmsford X) Straw 55708	7082	7.
<u>84</u>	2	JAN HORCHNER	2161 DOSWELDS	Mel	
<u>85</u>	3	hat Myen	2195 KNap St.	SPANA	
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89	1	COLLEEN LAKE	2314 Hillside Ave Apt 4 SHAUTHOUSHARK, MASS,	os Coller John
90	2	Rachel Fang	2348 Hillside Ave (st. Paul, MJ 55108	Parlet & 2
<u>91</u>	3	Margot Mousey	Am 1 110/16 . 13 11 . 1 A	MargorMorson
<u>92</u>	4	ERIC LOTOS	ST. PAUL, MN 55708	Ego lites
93	5	MICHAEL J. BLANIFIAN	1616 CONFRONTUS TOS	21/3
94	6	Mary Sage Schnewold	7777 Carter Are St Paul, MN SSIIS	Mul
<u>95</u>	7	Kanae Hanson	971 Manvel St. St Paul MV 55/14	Rence Harra
<u>96</u>	8	Regula Russelle	7265 Luther Place #1-303 54. Paul MN 55708	Regul Russelle
<u>97</u>	9	Michael Lukes	2323C harles Av Aproz STIPAUL MN 55114	Marhael Mutubes
<u>98</u>	10	Elizabeth Dickinson	384 Hall Ave. St. Paul MD55107	Eigenent

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99	1	Thomas E. Willing	146 Ray mans Ave. 6t. Parl, NN 55178	Horses Willia
00	2	maula T. Beum	St Richard Aue St Rich MN 55108	Manger.
01	3	Karen Bo Cain	Roseville, MASSII	3 Lead Coin
02	4	Michael Cain		mEca
03	5	Arry Gilbert MD, MG	I LOC WAALLA	anglittoo
04	6	R. Worth Frank	V	hux-
<u>05</u>	7	James Doyle	1403 Laurel Are 51. Paul MW 55104	John Co
06	8	Chuck Steffel	ST CAY, MN 55105	Weller
07	9	Chelsea DeArmond	St. Paul JAN SSTOL	Mille
18	10	Speng RIESCH	2251 JONALEST	Day W. D

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<u>109</u>	1	Sindo Kadrows	2251 Hillside Are.	Linda Kademos
<u>110</u>	2	Dowthy Walleving		Monath Welleveral
<u>111</u>	3	Lymitte Hausen	2253 Scuchast	Sunt from
112	4	Dan My Dun	2352 Buford Ar	Bire Myther
<u>113</u>	5	aplen Spregil	1502 Hythe St	alou R Spread
<u>114</u>	6	Betsy Herck	2228Hillsidan	· Setsy Marck
<u>115</u>	7	Kathlean Canviet	+ 1136 Raymond Aus	Valla Lexel
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	Number	Name	Address (Full Street, City, and ZIP Code) Signature
<u>116</u>	1	Lisa Habrock	2700 Dudley Aus STIDD Lie Stabeck
<u>117</u>	2	Cinty Smetana	Sh Paul MN 55ky Cindy Smilance
<u>118</u>	3	Mary Weyardt	38 Daul MN 55101 Mary Cellegral of
<u>119</u>	4	Chris Dobilberg	9211 Edison St NE Blane MA 55449 Bus Wellby
<u>120</u>	5	Julie Makena	St. Paul, MSS102 July Philadel
<u>121</u>	6	Stanly Steer	ST Paul Solos Francis
<u>122</u>	7	alise Mee_	St. Paul, 55109 alle Milher
<u>123</u>	8	Paula Carta	302 Curtice St W Paula Carte
<u>124</u>	9	SaralAgran	5+ Paul um 55708 Stere ADA
<u>125</u>	10	Judy Schumon	ner 57. Paul MD Wehurrocher
		/	55108 11

	Number	Name	Address (Full Street, City, and ZIP Code) Signature	
126	11	Anthony Schumbaker	54-7 Granthan () 54-Paul MN 55108	
<u>127</u>	12	Kelherine	Strand Mr SSIOS Gasher	
<u>128</u>	13	Will Quie	11 11 William	
<u>129</u>	14	Eliz, Quie	St. Paul, MN 55108 EHQ	
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<u>131</u>	16 ८	Thomas & de de	5 F Paulan 55/05 Throfoly	
<u>132</u>	17	Talia UNGair	2167 Radley Ave. Lastin Mile	
<u>133</u>	18	Scott Hamilton	1507 Chelms ford St. Wether	
<u>134</u>	19	Lori Hamilton	" Orthung	
<u>135</u>	20	Richard Dunc	an Mp/s, AN554/7 / Victor Sourcan	
<u>136</u>	21	Ama Gambria	12 Hat Dudles Ave. 1()	
<u>137</u>	22	Ben Reynolds	2167 Oudky No. 51.8 Se DK	
<u>138</u>	2	RITH WELECKS	1501 RZYMONITY PUROleui	
<u>139</u>	24	DIANNE PERKY	902 Salby Ave an Alarne Perry	
<u>140</u>	25	Stophen Cliva	2000 Een jamin Di	
<u>141</u>	26	A.M. Plourde	1606 Filleris Ive of Milloude	
<u>142</u>	27	Leo Wieffering	St. Paul, MN 55108	
<u>143</u>	28	Stumbultion YEHO	Stove St. Silari 55108 Stern Gult	
<u>144</u>	29	Ann R. Yetter	St Pane 55108 Com Yother	
<u>145</u>	30	Krista Nelsm	1520 Chelmsford Kibe M Noon	

	Number	Name	Address (Full Street, City, and ZIP Code)	Signature
<u>146</u>	31	Forhad ANKLESAR	1	Four Ade
<u>147</u>	32		1521 Chelmskonl	erostrall
<u>148</u>	33	Erica-Schumadu	12005 Ordlessare	. El
<u>149</u>	34	Andrew Collins	2205 Dullay Are	YA-
<u>150</u>	35	Marie Barnett	6121 15th Ave 5 MPLS, MN 55423	Man Pott
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Number	Name	Address (Full Street, City, and ZIP Code)	Signature
11	Sherwin James	3747 Hillside Ave St. Paul, MN 58708	Sier-Dan Jus
12	wiren of Blightan	2769 Hillside Map 53108	simplifice
13	COMMON SUMMORES OF A	2211 Husine tuc	Myran (Lew)
14	Andrea Waylan	2281 Hillsite Ave	unnengra
15	Sami Quinn	2291 Hillside Ave	Smign
16	Paul Boyd	2297 Hills, A.	But
17	818an Milan	2394 Hillside	Singlene
18	Aram LAACCILI	2727 Hillsy SSA	
19	Travis Pickell	11 Hillside Ct. St. Esies	Tuefall
20	Theatorelee	19 Hillside et &	Miller
21	Julie Lee	11 11	Julual
22	Patrick Me Naughton	25 Hillside et	This met aghter
2	WRY SAUNOS	15 Hillsdelawit	et boss
24	Alexa Stevenson	2380 Center Are.	yeur.
25	Juli Dah	hat Iside	Sin Doll
26	Richard Graff	of god California VARAN	en of
27	Allyu tin	St. your, MN SAN	allut
28	Paula Carrillo	2384 Carter AVE ST PANY MY	Delath
29	Nico Zbacnik	3340 Corter due 51. Pul MUGS108	PM
30	Lucie Turcotte	2390 Carter Ave St. Paul, MN 55708	Do F

Address (Full Street, City, and ZIP Code) Signature

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511 443 Street South Kill
APT 402 MPLS MN 555415 Number Name

		(5) 11 (5)	
Number	Name	Address (Full Street, City, and ZIP Code)	Signature
51	Kerin Devis	st.P. 5510B	100hin
52	Kevin Davis Margaret MacGregor Maria Rayuls	2185 KNapp St St. Paul 55188	marguet mac Gregor
53	Maria Bayuss	2185 KNapp St St. Paul 5518 R 2331 Gordon Ave St. Paul MN 55/08	MPEGIES
54	BILLWHELRN	रेर ।	Billah-
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	gaseriores d	Number	Name	Address (Full Street, City, and ZIP Code) Signature
	188	71	Teanna Rouillard	2-994 Carter Ave St. Paul MN 55108
	189	72	Danica Cutshall	2408 Carrey Avc Dailes
	<u>190</u>	73	Chris McCrory	St. Paul MN SSICE MY My My
	<u>191</u>	74	Jaune Williams	St Pand Mrs 55188 Grunds
	<u>192</u>	75	Charles Williams	2407 Cad-1 Ave Sy Part MSSSIGS Chro man
	193	76	Kim Wiese	2369 Carter And 57 Phyl M 55138
	194	77	Eugene Crawsha	2349 Costes 251, Paul 55/00
	<u>195</u>	78	Chris Long	1315 Keston Ave 1. Jun 2001
	<u>196</u>	79	Jusy Woodward	SI Paul SSION SI Ded inedical
	<u>197</u>	80	Lee Carey	2342 BOWN AN FOOD
	<u>198</u>	81	Hans Olaf Planny	2358 Bourne Ave Hothendal
	<u>199</u>	82	Sue Grove	2362 Bourse Ave Juni Grove
	200	83	Andy Love ons	2374 Barre for 108
	<u>201</u>	84	Alica Duggen	2399 Bourne Thoughan
	<u>202</u>	85	Dayol Lavory	2396 Bourne Hay The
	203	86	1 ANZ DOGAN	2399 BONRUE 55
	<u>204</u>	87	Mak Joden	2387 Boune Malorda
	<u>205</u>	88	A Secretary	2379 BOWENE DOS
	206	89	JAKE WINTER	2375 WEST BOURNE AVE. 55103 9W
	<u>207</u>	90	Henry Hansen	3369 Pairie Aje Tem Arson
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- This site is environmentally sensitive and supports a wide diversity of organisms.
- Hazardous levels of lead have been identified on this former dump site.
- The site has not been adequately sampled to locate areas requiring remediation.
- Preconstruction site investigation is required because lead cannot be identified by sight or smell during construction.
- Applicants have not determined whether lead is concentrated in fine particles, which are most likely to expose workers, the public, and the ecosystem to this toxin.
- The stormwater system is inadequate to retain and treat runoff water, threatening nearby water bodies.

	Number	Name	Address (Full Street, City, and ZIP Code)	Signature
208	1	Christine Harding	1479 Hythe St. St. Paul. MN 55108	Chienting
209	2	Adam Harling	1479 Hyrac St. St Paul MU 55108 S	als
210	3	BethFreschi	2252 Commonwealth Are 5+ f.wl, MN 55108	Both Shar k
211	4	Ecizabeth Walder	2264 Commune & Ave 84. Paul 55/08	gokul
<u>212</u>	5	Mary Scanlan	23 55 Common Weath	mary scarlas
213	6	Tom Searlan	5t. Paul, MN S5108	Jon Scarlan
214	7	Both Canners	2794 CAMANGARTH 55 PAUL 55788	10
<u>215</u>	8	PAUL HARDING	2202 FOLKEL PLO FALCON 413 55108	~:
<u>216</u>	9	Speak langlood	ZZOZ MON AC FARCENO HUANT SSION	800
<u>217</u>	10	Whene West	7292 Carter Ave Si Paul 55108	Antero Wood

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Number	Name	Address (Full Street, City, and ZIP Code)	Signature
1	DOR. GRAPE	Commonwealth Ave	MENT.
ž	Michael Parhan	2381 Common wedl Ave 2376 SSTUY	MAL
3	ERIK SKJON	2376 SSTUB	En The
4	Declinda Skjon	2376 Commonwealth AVE	Bush
5	Tim Glarding	CORDON PL	TIM HARDING
6	ysix/her-	2341 COMMONWERT	MARK MABEL
7	Kate Mabel	7341 Commonwealth	Kate Mabel
8	Ferry, So	2321 Efection Avi	They be
9	Ahra Graber	2327 Carden Are	4
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Number	Name	Address (Full Street, City, and ZIP Code)	Signature
1	Alyssa Debrimier	1932 Park Street white Box lake, my 55110	aysoayuuch
2	I am View	3704 74th St E Invertorove HS+5 MX	260
3	Nina Flynn	12569 GAVOTTE CT Apole VALLEY, MIVES 124	anialiteren
4	Lynda Mona	St poul MNN 551118	An I
5	Jum Thones	905 transit Ave Roseville MS 55113	Gena Trover
6	STENHEN SAGE	5 F PAGE 17 N SSIO	
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ATTACHMENT 1:

SAPCC Appeal of St. Paul's Zoning Resolution 19-54 (File Number # 19-088-143) November 1, 2019

ATTACHMENT 2: SAPCC Appeal of SPR File # 19-075478

ATTACHMENT 3:

Internal Memo between MPCA's Reviewers Regarding a Previous Project Proposal on This Site

Source:

https://webapp.pca.state.mn.us/wimn/site/199999/documents

(from: 04/05/1995): "comments on work plan outline-includes handwritten notes")

Grigor, Lynne [GWSRS]

From:

Grigor, Lynne [GWSRS]

To:

Zachmann, Joe [GWSRS]

Subject:

Elm Street Ash Dump, PT 3890

Date:

Wednesday, April 05, 1995 11:34AM

Here are my comments on the Work Plan Outline Leonard Krumm sent in his letter dated March 28, 1995:

- "No significant risk" needs to be defined unless the City feels comfortable addressing that issue when the Phase II has been completed.
- 2. Is the City planning on just addressing wastes in Minneapolis or will the study include St. Paul if there are indications that the dump extends across the city limit?
- The work plan covers potential contaminant sources other than the dump. The City should be notified of the Capp Industries project and the August 6, 1992 notification of creosote along Kasota Avenue.
- 4. The City should contact the MPCA ash "experts" (Carol Andrews, Bob Criswell and the current "ash" staff) before their consultants conduct a literature search. Much of the data is probably compiled already.
- 5. I'm not sure what they mean by "limited health risk assessment". They will need to give a detailed description of their proposed health risk assessment in the Work Plan.
- 6. No geophysical investigation is mentioned. Did they decide not to do one?
- 7. Page three (Section 1.2) mentions a "geotechnical investigation". We need an environmental investigation due to possible health threats to the drillers and (at a minimum) to collect basic field data (organic vapor readings, waste description by trained environmental professional, etc.).

- Lynne G

Here are Lynnes comments on the Proposed work Plan. Please consider them. We're routewiner the geotechnical surveys report you forwarded. I Let's set up a phone conf. call sometime in the next few weeks. We'll wait to hear from you.

St. Anthony Park Community Council/District 12 2395 University Avenue West, Suite 300E Saint Paul, MN 55114



To: Dave Carland Venture Pass Partners, LLC 19620 Waterford Court Shorewood, MN 55331

Randy Rauwerdink Venture Pass Partners, LLC 19620 Waterford Court Shorewood, MN 55331

November 26, 2019

Re: Application of Rohn Industries for Site Plan Approval for 2495 Kasota Avenue, St. Paul, Minnesota

Dear Mr. Carland and Mr. Rauwerdink:

I am writing on behalf of the St. Anthony Park Community Council in regards to the Rohn Industries Trailer Storage project. This letter is to inform you that SAPCC has filed a Petition for an Environmental Worksheet for the project with the Environmental Quality Board.

Best regards,

Kathryn Murray, Executive Director kathryn@sapcc.org | 651-649-5992

Kathryn Murray

www.sapcc.org

cc: Environment Quality Board Matt Privatsky, Ward 4 Aide