

From: [Joe Cox](#)
To: [*CI-StPaul](#), [Contact-Council](#), [CouncilHearing \(CI-StPaul\)](#)
Subject: RES PH 21-21 Krause Anderson Noise Variance at 2383 Apartments
Date: Friday, February 5, 2021 4:56:55 PM

Saint Paul City Council,

Kraus Anderson's application for a noise variance at 2383 University Apartments grossly ignores universally held guidelines on public health and safety standards for noise. If approved, the additional noise would be injurious to the public, and would also be extremely disruptive to businesses and residents, some of which may already be challenged or homebound during a global pandemic. I would trust the city to put the safety and wellbeing of its residents first, before enhancing the profit margin of a contractor; the denial of this variance does not preclude the project from completing, though it will require Kraus-Anderson/Ramsey to employ less traumatic and more reasonable construction methods.

As per the National Institute for Occupational Safety and Health (NIOSH), their *Recommended Exposure Limit* establishes guidelines for human exposure to noise. As stated by the guidelines, the maximum duration for 85db is 8 hours, and the maximum for 95db is 47 minutes. At 125db, which is the maximum level requested by Kraus Anderson in this variance, these guidelines state just 3 seconds of human exposure is acceptable. To be clear, these are the maximum levels that no exposure "shall equal or exceed".

I own a commercial building just over 1 block away, and I can personally certify that this project's noise regularly exceeded 85db prior to the filing of this sound level variance application. Standing outside my building, with my own decibel meter, I recorded regular readings well over 85db from this reasonable distance away. Significant vibration and noise were also noticeably disruptive inside my two-story, all masonry, pre-stressed concrete office building. I do question the integrity of a contractor with any degree of experience, that would otherwise proceed with work of this scale without demonstrating any respect for city code. Surely they were aware of the noise they were producing in excess of that code. I'm also appalled that they would request a limit as dangerously high as 125db within their variance. The timing of this variance application is also curiously convenient, as I had filed a complaint with the City of St. Paul prior to Kraus Anderson's application for this variance.

Kraus-Anderson and others have a right to construct and develop their property and I frankly support the enhancement of the neighborhood. As someone who owns a large land parcel in the area, I too am interested in the repurposing of my property. However, with myself included, developers need to respect code and guidelines. These are set to protect safety and wellbeing, and shouldn't be ignored just when inconvenient, or to improve project cost and time effectiveness. Furthermore, any sound mitigation conditions, in exchange for an approved variance, would be purely performative and lacking of any substance or consideration for their excess noise that would still be created.

Kraus-Anderson needs to use less disturbing and more reasonable construction methods that allow them to operate within the acceptable noise parameters. Such would not be unreasonable, as similar scale projects and those of greater size have utilized far less disruptive means in their urban project, not to mention those completed in historically-sensitive areas. The Deep Foundations Institute, a professional group that Ramsey Companies themselves subscribe to, goes so far as to outline alternative methods for these sites— acknowledging that that noise and vibration associated with steel pile installations tend to preclude the use of them in urban other sensitive areas.

For the reasons stated above, I strongly encourage the city not to grant this variance.

Regards,
Joe Cox
Owner of 2469 University Ave W



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