city of saint paul planning commission resolution file number date

WHEREAS, Wabasha Partners LLC, File # 19-084-455, has applied for a conditional use permit for a reception hall under the provisions of § 61.501 of the Saint Paul Legislative Code, on property located at 160-162 Wabasha Street South, Parcel Identification Number (PIN) 06.28.22.41.0033, legally described as Lots 5-9, Block 179, Robertson's Addition to West St. Paul; and

WHEREAS, the Zoning Committee of the Planning Commission, on October 24, 2019, held a public hearing at which all persons present were given an opportunity to be heard pursuant to said application in accordance with the requirements of § 61.303 of the Saint Paul Legislative Code; and

WHEREAS, the Saint Paul Planning Commission, based on the evidence presented to its Zoning Committee at the public hearing as substantially reflected in the minutes, made the following findings of fact:

- 1. The applicant is applying for a conditional use permit to allow an event center with an event capacity between two-hundred (200) and three-hundred (300) people.
- 2. § 61.501 lists five standards that all conditional uses must satisfy:
 - (a) The extent, location and intensity of the use will be in substantial compliance with the Saint Paul Comprehensive Plan and any applicable subarea plans which were approved by the city council. This condition is met.

The 2030 Comprehensive plan labels this property Mixed Use Corridor. Growth in this area "provides for housing for changing demographic groups, jobs that capitalize on emerging labor markets, and commercial areas with goods and services for people who live and work along them." Mixed Use Corridors are centered on arterial and collector streets and primary thoroughfares, providing a mix of residential and commercial uses. Wabasha Street is a primary connection between Downtown and the West Side neighborhood. Additionally, the Comprehensive Plan "recognizes that some existing commercial areas attract regional patrons as well as local customers [and] are more oriented to the automobile." The form of this building, brought close to the right of way and acting as an anchor for the block, conforms to traditional urban form principles encouraged by the Plan. The following Land Use policies support the harmony between the 2030 Comprehensive Plan and establishment of an event center that exhibits traditional urban building form at this location:

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seconded	by		
in favor _			
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- 1.24 Support a mix of uses on Mixed-use Corridors
- 1.46 Encourage the expansion of compact commercial areas in Neighborhood Centers and Mixed-Use Corridors to further the objectives of both categories of neighborhoods.
- 1.47 Ensure that streets in compact urban building form, streetscape amenities, and traffic calming measures.
- 1.49 Continue to promote principles of traditional urban form in the design of new or renovated commercial buildings.

This parcel lies on the western-most edge of the West Side Flats as covered by the West Side Flats Master Plan ("Master Plan", adopted 2013) which envisions on the West Side Flats "a broad mix of land uses, retention and growth of jobs, and appropriate transitions between neighborhoods and employment land uses." The Master Plan also designates this parcel a Mixed-Use Corridor, which accommodate "a broad mix of land uses, such as residential, retail, restaurants, office, civic/institutional. ... Street-level uses should be predominantly non-residential..." Land use strategies in the Master Plan that support establishment of an event center at this location include the following:

- LU2) Promote active commercial, civic, and institutional land uses at street level within buildings facing Mixed-Use Corridors, including the River Esplanade.
- LU5) Cultivate stronger relationships between Employment Center businesses, new residents and employees on the West Side Flats, as well as the greater West Side community.
- LU7) Reuse selected older industrial buildings that no longer meet the needs of more conventional industrial users but that have the potential for high job density.
- LU8) Promote redevelopment of vacant and underutilized sites to benefit existing businesses, attract new businesses, and create an Employment Center.

The West Side Community Plan (adopted 2013) also applies to this parcel. Supporting this application are the following Objectives:

- LU1) Support land use that balances the housing, commercial, industrial, ecological, agricultural and green space needs of the community.
- LU3) Promote development that maintains the traditional urban form...
- B1) Reinvigorate the economy on the West Side through commercial/industrial start- ups and business expansion.
- (b) The use will provide adequate ingress and egress to minimize traffic congestion in the public streets. This condition is met. The proposed site plan includes ingress and egress points for the thirteen parking spaces on the property. Both are over one hundred (100) feet from the intersection of Wabasha Street and Plato Boulevard, and will provide adequate ingress and egress to minimize traffic congestion on public streets. The applicant is arranging a shared parking agreement for use of parking spaces directly north of the site, in a parking lot that has adequate ingress and egress to minimize traffic congestion on public streets.

- (c) The use will not be detrimental to the existing character of the development in the immediate neighborhood or endanger the public health, safety and general welfare. This condition is met. The existing character of this area includes compatible commercial and restaurant businesses. The applicant has stated this event center will be primarily used on weekends and in evenings, avoiding traffic and parking conflicts with surrounding uses which primarily generate traffic during business hours on weekdays.
- (d) The use will not impede the normal and orderly development and improvement of the surrounding property for uses permitted in the district. This condition is met. Improvements to this building and property will be contained within the lot boundaries. The proposed event center will not impede use of the surrounding property, and is compatible with surrounding uses.
- (e) The use shall, in all other respects, conform to the applicable regulations of the district in which it is located. This condition is met subject to approval and maintenance of a shared parking agreement, under the provisions of Zoning Code § 63.206(d), for use of a nearby parking lot for the number of required parking spaces not provided on the site

NOW, THEREFORE, BE IT RESOLVED, by the Saint Paul Planning Commission, under the authority of the City's Legislative Code, that the application of Wabasha Partners LLC for a conditional use permit for a reception hall at 160-162 Wabasha Street South is hereby approved, subject to the following conditions.

- 1. Final plans approved by the Zoning Administrator for this use shall be in substantial compliance with the plan submitted and approved as part of this application.
- 2. A shared parking agreement under provisions of Legislative Code § 63.206(d), subject to approval by the planning commission and the zoning administrator, must be secured and maintained for the number of required parking spaces not provided on the site.

The draft resolution for ZF #19-088-143, Rohn Industries Trailer Parking, will not be available until early next week. It will be posted as soon as it is available.

ZONING COMMITTEE STAFF REPORT

FILE #19-088-143 (PC) FILE #19-075-478 (SPR)

1. **APPLICANT:** Rohn Industries **HEARING DATE:** 10/24/2019

2. TYPE OF APPLICATION: Site Plan Review

3. LOCATION: 2495 Kasota Ave

4. **PIN & LEGAL DESCRIPTION:** 202923330007 Auditor's Subdivision No. 64 Subj To Kasota Ave Part N Of CI Of Sd Ave Of Lot 2

5. **PLANNING DISTRICT:** 12 – St. Anthony Park Community Council **PRESENT ZONING:** 11

6. **ZONING CODE REFERENCE:** §61.402 – Site plan review by the Planning Commission

7. STAFF REPORT DATE: 40/18/19 10/21/19 BY: Amanda Smith

8. DATE RECEIVED: 8-9-19 DEADLINE FOR ACTION: 12-7-2019 (Extension letter sent)

A. **PURPOSE:** Appeal of the Conditional Approval of a Site Plan Review for improvement of an existing vacant lot proposed for outdoor storage.

B. **PARCEL SIZE:** 72,652 square feet (approximately 1.668 acres)

C. EXISTING LAND USE: Vacant

D. SURROUNDING LAND USE:

North: Railroad, Industrial (I1)

East: Railroad, Minnesota Trunk Highway 280 (I1) South: Public Works drainage pond, Industrial (I1, I2)

West: Railroad, Industrial (I2)

E. ZONING CODE CITATION:

• §61.402(c) – Findings for site plan review and approval

F. HISTORY/DISCUSSION:

Rohn Industries (the applicant) is a paper recycling business located at 862 Hersey Street, approximately 1.3 miles south-east of 2495 Kasota. The applicant proposes to pave the currently vacant site located at 2495 Kasota Street for use as a trailer staging area for their current and expanding business operations.

A site plan review committee meeting for the proposed project was held on 8/27/19 and a site plan review conditional approval was issued on 9/16/19. (Reference attached SPR Conditional Approval Letter). A site plan review status memo update was issued on 9/20/19. (Reference attached SPR Status Memo Update). The site plan conditional approval zoning decision was appealed by the St. Anthony Park Community Council on 9/25/19. (Reference attached SAPCC Zoning Appeal). A site plan review 15.99 extension was issued on 9/30/19. (Reference attached SPR 15.99 Extension).

G. DISTRICT COUNCIL RECOMMENDATION:

The St. Anthony Park Community Council issued three letters addressed to city staff in opposition

of this project (electronically dated 8/26/19, 8/31/19, and 9/5/19). (Reference attached SAPCC letters). The three letters have been provided to the developer and city site plan review committee staff. On 9/27/19 the district council provided in person to city staff a document entitled "Historic Waters of the Capitol Region Watershed District Ramsey County, Minnesota" by Greg Brick, M.S. (dated November 2008). (Reference attached Historic Waters of the CRWD document).

- H. **FINDINGS**: Section 62.108(e) §61.402(c) of the Zoning Code says that in "order to approve the site plan, the planning commission shall consider and find that the site plan is consistent with" the findings listed below:
 - 1. The city's adopted comprehensive plan and development or project plans for sub-areas of the city.

The site plan meets this finding.

The proposed development is consistent with the goals and issues as defined in the Saint Anthony Park Community Plan as part of the purview of Water, Soil and Air (pg. 39-57)

 WSA3 seeks to Reduce the input of contaminants to surface waters from Saint Anthony Park. Capping this site with a bituminous surface will limit the amount of water percolating through contaminants underground on the site.

The Development Guidelines for the St. Anthony Park Community Council are supported by the site plan, specifically among the following priorities:

- 3: Green Space: Maintain, enhance, and if possible, create green space on a developed parcel. We encourage going beyond City landscaping and site requirements. The site plan proposed exceeds the tree planting requirements within the zoning code.
- 9: Dark Skies: To the maximum extent possible, keep site lighting from spilling onto adjacent properties and keep it aimed down. The site plan submitted proposes lighting that is aimed downward and does not spill onto adjacent properties.

The 2040 Comprehensive Plan of the City of St. Paul is supported, championing the following points:

- Economic Development Growing Saint Paul's tax base to maintain and expand the City services, amenities and infrastructure. Developing this lot as a storage site for trailers will allow Rohn Industries to continue to operate within the City of Saint Paul. Improvements on this parcel will be taxable, and will contribute more than the current vacant parcel.
- The parcel has not been identified as a Public water basin, park, wetland, river source nor other public watercourse (pg. 199)
- The parcel has not been identified as a storm sewer or other type of green infrastructure.
- 2. Applicable ordinances of the City of Saint Paul.

The site plan meets this finding. Per Legislative Code §66.541 the site plan meets the required conditions for outdoor storage/outdoor use in an I1 zoning district. (Reference attached Site Development Plans and Photometric Plan).

- The site is located approximately 375 feet from the closest residentially zoned parcel which is located to the east of the site and separated by an elevated four-lane highway (MNTH 280). (Reference attached Photos Residential towards site).
- The outdoor storage is enclosed with a six-foot-high chain link fence, and the portion of the outdoor storage that is visible from Kasota Avenue (a thoroughfare) is screened with privacy slat inserts.
- There is no proposed servicing, processing, or manufacturing on-site.

3. Preservation of unique geologic, geographic or historically significant characteristics of the city and environmentally sensitive areas.

An incidental wetland determination application was submitted to city staff on 7/30/19. (Reference attached MN WCA Notice of Decision). The application asserted the area in question reflects wetland characteristics but is an incidental wetland created in an upland for a purpose other than creating a wetland. The applicant's opinion was based on a site visit, historic aerials, soil information, and previous development plans approved by Saint Paul. (Reference attached Sambatek Wetland Determination Memorandum- Online).

In 1986 a stormwater pond was designed, approved by the City, and constructed in the southwest corner of 2495 Kasota Avenue. The state Wetland Conservation Act (WCA) was passed in 1991. The WCA does not regulate impacts of incidental wetlands, defined as wetland areas that the landowner can demonstrate, to the satisfaction of the local government unit (LGU), were created in nonwetland areas solely by actions, the purpose of which was not to create the wetland. This includes stormwater retention improvements which over time may take on wetland characteristics. City staff reviewed the information and found the area in question to be adequately demonstrated as historically upland. Therefore, city staff concurred with the assertion and on 8/23/19 noticed a decision that the area in question is an incidental wetland.

The WCA provides for a specific process to appeal a LGA staff decision pursuant MN Rule 8420.0905. (Reference attached MN Rule 8420.0905). This appeal information was provided to St. Anthony Park Community Council on 9/6/19 after the letter dated 9/5/19 from the district council requested information as it relates to the wetland delineation alteration documentation. Appeals can only be commenced by mailing a petition for appeal, including applicable fee, within 30 calendar days of the date of the mailing of the notice of decision.

4. Protection of adjacent and neighboring properties through reasonable provision for such matters as surface water drainage, sound and sight buffers, preservation of views, light and air, and those aspects of design which may have substantial effects on neighboring land uses.

This finding is met.

The applicant voluntarily enrolled in the MPCA's Brownfield Program on 7/2/19. (Reference attached MPCA Voluntary Remediation Program Enrollment). The MPCA issued a No Association Determination letter on 9/10/19. (Reference attached MPCA No Association Determination letter). The MPCA's staff determination was based on the following documents prepared by Landmark Environmental:

- Landmark Environmental Phase I Environmental Site Assessment (4/30/19) (reference online)
- Landmark Environmental Phase II Investigation (6/25/19) (reference online)
- Proposed/Past Action Letter (6/28/19) (reference attached Landmark Environmental NAD Request Letter)

A MPCA No Association Determination letter is a legal determination that the developer is not responsible for the contamination detected at the site, as described in the letter, and that the actions proposed by the developer, as described in the letter, will not alter that determination. The letter contained several conditions and qualifications that must be met for the determination to remain valid.

The developer additionally provided the following documents to the MPCA on 7/2/19 at the date of enrollment, relative to how they will manage environmental activities during construction:

- Response Action Plan (RAP) (7/1/19) (reference online)
- Construction Contingency Plan (CCP) (7/2/19) (reference online)

On 10/17/19 MPCA Brownfields staff issued an approval letter for both the RAP and CCP. (Reference attached MPCA RAP/CCP letter).

The MPCA's Brownfield Program does not have regulatory authority relative to land-use decisions. The role of the Brownfield Program is to make sure that environmental issues are appropriately addressed during construction and redevelopment, for those projects that voluntarily enroll in the Brownfield Program. MPCA staff were provided the three referenced letters submitted by the St. Anthony Park Community Council to the city, outlining their environmental concerns. MPCA staff indicate that they considered the expressed concerns during their review of the project.

The Minnesota Department of Health issued a Letter Health Consultation (LHC) on 10-7-19 addressed to Kathryn Murray and the St. Anthony Park Community Council. (Reference attached MDH Letter Health Consultation). The letter indicated the MDH believes the proposed development at 2495 Kasota does not pose a public health hazard, based on staff's review of environmental reports and comparing site containment levels to environmental criteria.

5. The arrangement of buildings, uses and facilities of the proposed development in order to assure abutting property and/or its occupants will not be unreasonably affected.

The site plan meets this finding. Per Legislative Code §63.114 (visual screens) the site meets the screening requirements.

- Wherever a visual screen is required by this code, it shall be of sufficient height and density to visually separate the screened activity from adjacent property. The screen may consist of various fence materials, masonry walls, earth berms, plant materials or a combination thereof.
- Height regulations for outdoor storage require a minimum of a six-foot fence (§66.541).
- Visual screens shall be located completely within the lot line.
- The land between the screen and the property line shall be landscaped and maintained so that all plant materials are healthy and that the area is free from refuse and debris.
- 6. Creation of energy-conserving design through landscaping and location, orientation and elevation of structures.

This finding is met. Per Legislative Code §63.314 (landscaping) the site meets the

requirement through landscaping and tree plantings.

- On plan sheet L1.01 the developer proposes to plant 16 shade trees, and all undeveloped space are shown as a MNDOT seed mix.
- 7. Safety and convenience of both vehicular and pedestrian traffic both within the site and in relation to access streets, including traffic circulation features, the locations and design of entrances and exits and parking areas within the site.

This finding is met.

MnDOT was provided the site plan based on the proposed project's proximity to MNTH280. MNDOT issued a review letter on 8/30/19 recommending that the city require a traffic study and requiring the applicant to obtain a MnDOT Drainage Permit. (Reference attached MnDOT Review Letter).

The applicant provided a traffic narrative to the city dated 9/26/19. This narrative identified a defined traffic pattern between the main site at 862 Hersey Street and the proposed development at 2495 Kasota Avenue. (Reference attached Rohn traffic narrative). Ingress to the site will be from the east via Energy Park Drive, egress from the site will be towards the west east via Energy Park Drive, and there is no proposed use of MNTH280. Turning movement exhibits for a 53-foot trailer (WB 67) and fire truck were required and provided. (Reference attached turning movement exhibits). The driveway entrance allows adequate space for trucks entering and exiting the site to queue on private property and not public right-of-way. The site plan shows space for 25 trailers, with a projection of 20 truck movements per day.

The applicant noted that they employ their own drivers whom will be made aware of the traffic flow policy. The travel route within the traffic narrative dated 9/26/19 will become the standard operating procedure, and added to the driver's instructions.

The applicant worked with city Public Works staff to design an entrance location based on the proposed traffic pattern. A best practice in the Public Works street design guidelines is to locate driveway entrances 100 feet outside of an intersection, but based on site specific considerations this guideline was not required.

If at a future date the current or new land owner determines that west bound or MNTH280 access is needed the orientation of the driveway would require modification. This modification would require review and approval by the city's Public Works Department.

On 10/17/19 city staff were notified in writing by MnDOT staff that the proposed driveway location at Energy Park Drive is MnDOT right of way, and therefore will require a MnDOT access permit. (Reference attached MnDOT graphic). Ramsey County data available to city staff does not show this area to be MnDOT right-of-way. MnDOT staff additionally indicated they are currently evaluating the intersection of Energy Park Drive and MNTH 280 ramps. There is likely to be a traffic signal installed there in the future, but because MnDOT is still completing their evaluation, MnDOT could not provide information on precisely where and how the equipment will be located and configured. Based on this new information city staff and MnDOT staff have agreed that the access driveway should line up directly opposite the MNTH 280 ramps intersection. City Public Works staff will work with the applicant to review an updated design of the driveway entrance. The site plan will not be approved until it receives approval from city Public Works staff and a MnDOT Access Permit.

Additionally, based on recent MnDOT staff reviews of the Rohn Industries Traffic Narrative, conversations with City staff, and the requirement that city staff will review any future change(s) in operations or use(s) that will affect trip volumes to/from the site, MnDOT is no longer recommending that the city require a traffic impact study for this development.

8. The satisfactory availability and capacity of storm and sanitary sewers, including solutions to any drainage problems in the area of the development.

This finding is met.

The stormwater system meets City standards for run-off rate control. Changes in stormwater runoff rate are a result of changes in land use and land cover. The city's stormwater rate control standard restricts a site's discharge rate to 1.64 cubic feet per second per acre of disturbed area. This standard is based on mitigating changes in land cover that accelerate the rate of runoff. The modeling appropriately reflected proposed land cover and land use drainage patterns, and proposed stormwater practices to control changes in runoff rate.

The applicant's stormwater engineering report dated 8/9/19 states "the soils on-site are largely contaminated." (Reference attached Sambatek Preliminary Stormwater Management Plan report- Online). A geotechnical report dated 6/21/19 was included as an appendix. (Reference attached geotechnical report Appendix C - online). The geotechnical report describes test pit and soil boring results.

The stormwater engineering report and site plan indicates alternative (non-infiltration) methods to manage stormwater will be employed. This is consistent with the Minnesota Construction Stormwater Permit which prohibits permittees from constructing infiltrating systems where infiltrating stormwater may mobilize high levels of contaminants in soil or groundwater.

Therefore, the infiltration test method, as well as other infiltration requirements including a three-foot buffer, are not relevant given the extent of documented contamination which precludes infiltration as a stormwater management practice.

Final site plan approval will not be granted by city staff until the project shows conformance with MWMO standards. (Reference attached MWMO Letter and MWMO Design Sequence Flow Chart). This approval includes calculations and/or device sizing information showing that a 60% total phosphorus removal is provided by the proposed design. The report and plans must also indicate the specific type of filtration device and include an operation and maintenance plan.

9. Sufficient landscaping, fences, walls and parking necessary to meet the above objectives.

This finding is met. Reference line items #5 and #6 of this staff report.

10. Site accessibility in accordance with the provisions of the Americans with Disabilities Act (ADA), including parking spaces, passenger loading zones and accessible routes.

This finding is not applicable.

11. Provision for erosion and sediment control as specified in the ``Ramsey Erosion Sediment and Control Handbook."

The site plan meets this finding. The site plan includes an erosion and sediment control

plan that meets this standard.

I. STAFF RECOMMENDATION:

Based on the findings above, the staff recommends denial of the appeal and approval of the site plan to allow outdoor storage at 2495 Kasota Ave., subject to the following conditions:

- 1. Final approval by the DSI Zoning Division to reflect compliance with MWMO standards. (Staff signed off)
- 2. Final approval by the Public Works Sewer Division to include a public sewer easement and encroachment permit. (Staff signed off)
- 3. Final approval of the driveway location by the Public Works Transportation Planning and Safety Division.
- 4. Receipt of a MnDOT access permit for driveway construction.



October 17, 2019

Wes Saunders-Pearce City of St. Paul 375 Jackson Street – Suite 220 St. Paul, MN 55101-1806

SUBJECT: Stormwater Comments – Rohn Industries

Dear Wes:

Please find below the responses to stormwater comments received on 10/15/19. We have provided a response to each comment and are including a revised set of Civil drawings and a revised Stormwater Management Plan that correspond with the changes noted below.

- Please briefly edit the narrative to better explain why water reuse is not an option. The rationale
 justifying FTO is reasonable, with one exception. Contamination is not a constraint to water reuse as an
 option. For instance, at this site, I would expect the limited amount of reuse opportunities (ie. no
 irrigation, etc.) to be a larger driver for why reuse is not an applicable option.
 - **Response:** The site is not suitable for irrigation due to limited greenspace and steep grades of greenspace on site. See revised report dated 10/17/19.
- Please explain or show more directly how the site TSS removal correlates to expected TP removal. Highlighting sections of past studies helps provide overall credence to the technology's capability, however, the report narrative needs to express a clear statement of compliance.
 Response: A study was conducted by Mitchell Community College on the Stormfilter on a site of similar size and impervious area as the proposed Kasota Ave Trailer Storage site. The results are highlighted to explain expected removal rates for this project in the updated report. See revised report dated 10/17/19 for the full comparison and analysis.
- Please clarify how the treatment flow rate (0.15 cfs) relates to expected discharge rates from the pond. The revised stormwater report only provided proposed discharge rates for the 100-year event (0.75 cfs peak). The report needs to explain how the treatment flow rate will be maintained and how often the system is expected to be bypassed.
 - **Response:** Any flow in excess of 0.15 cfs will bypass the cartridges and enter an overflow riser which was designed to allow the passage of the 100-year storm event. See revised report dated 10/17/19.
- The operation and maintenance plan was provided in the stormwater report. Please add to the utility sheet a "post-construction operation and maintenance" section. Include key steps from the O&M plan to guide the property owner and provide a reference (vendor web or phone) for more detail.

 Response: Key items from the Stormfilter Inspection and Maintenance Procedures by Contech have

been added to the Utility Plan.

- Please provide a detail of the proposed 4-inch orifice. As well, will there be a skimmer structure to prevent clogging?
- **Response:** A detail of the pond outlet (FES 100) has been added included the 4" to 12" pipe transition and trash guard. See detail 06 on C9.02.

Sincerely,

Chad Ayers, PE

Senior Project Manager

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Site Development Plans

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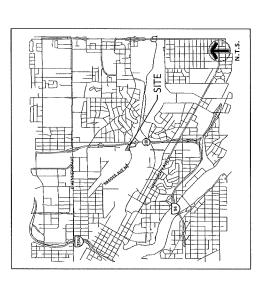
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ROHN INDUSTRIES TRAILER STORAGE

St. Paul, Minnesota

Presented by:

Venture Pass Partners



CIVIL ENGINEER
SAMBATEK
T.2800 WHITEVATE, DRIVE, SUITE 300
MINNETONKA, MN 55343
TEL 784-276-6010
TEN 784-476-6020
CONTACT: CHAD AVERS, PE, LEED AP

DEVELOPER/OWNER
VENTURE PASS PARTNERS, LLC
19620 WATERFORD COURT
SHOREWOOD, MN 55331
TEL 612-801-4333
CONTACT: RANDY RAUWERDINK

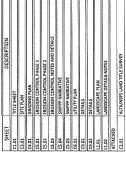
=== CONSULTANT CONTACT LIST: ==

SURNEYOR SURVERME, LIC SURGETAND SURVERME, SUITE 118 BLOOMINGTON, MN 55420 TE, 922,881-355. COWINGT, RILEE GARLSON, PLS

GEOTECHNICAL BRAUM NITERTE 11001 HAMPSHIRE AVENUE SOUTH MINICAPOUS, AN 55438 FIEL 552-995-2000 FAX 952-995-2020 CONTACT: ROBERT JANSSEN, PE

VICINITY MAP NO SCALE

LANDSCAPE ARCHITECT SAMBATEK TUSBOW WHITEWATER DRIVE, SUITE 300 MINNETONKA, MN 55343 TLC 1864-276-6010 EAX 784-476-8532 CONTACT: WILLIAM DELANEY, PLA



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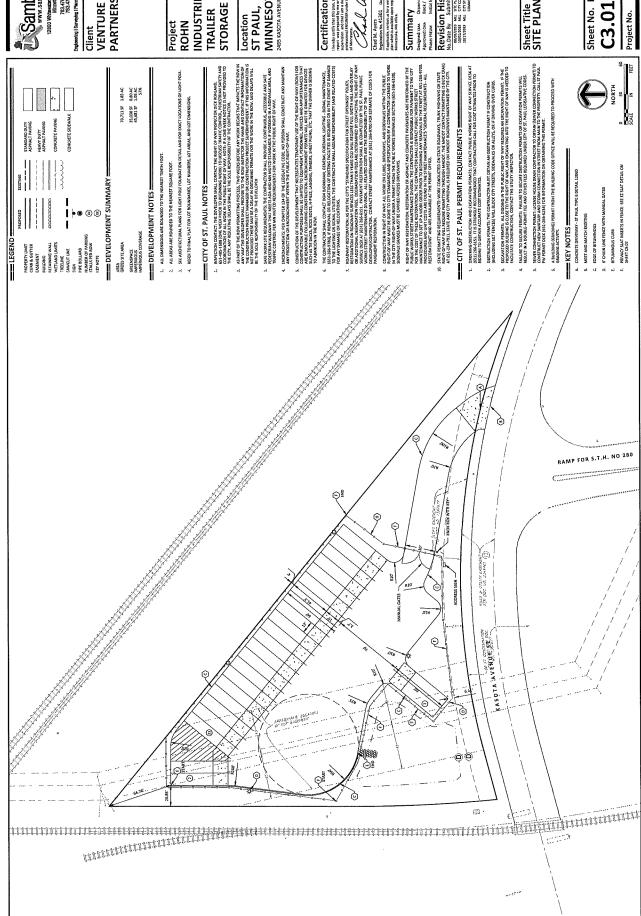
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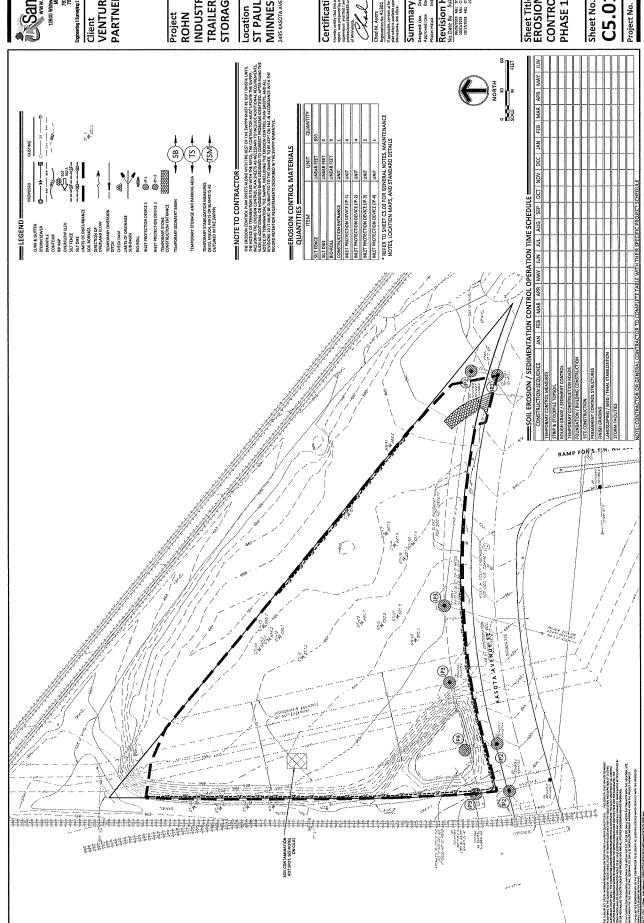
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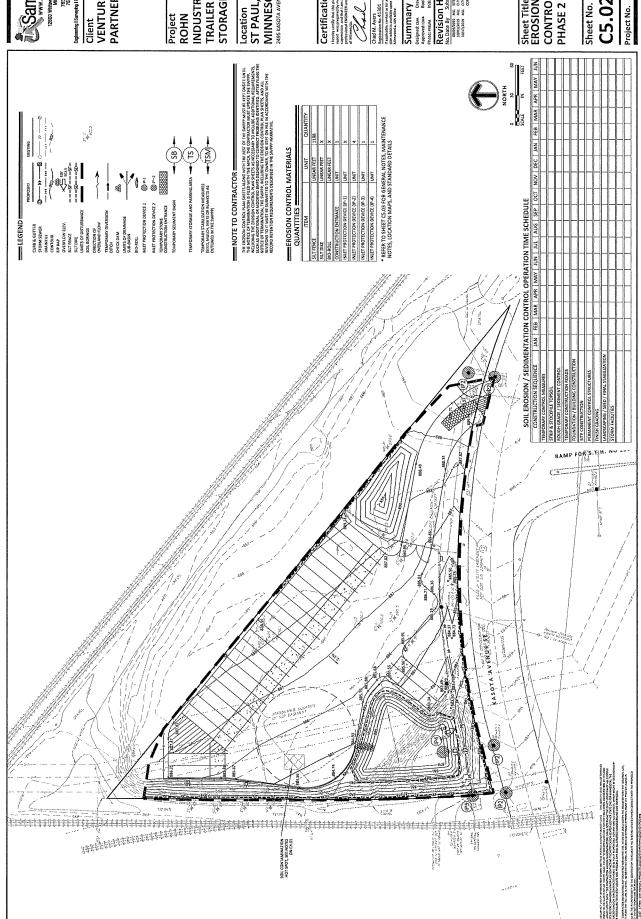
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Project ROHN INDUSTRIES TRAILER STORAGE

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2495 KASOTA AVENUE

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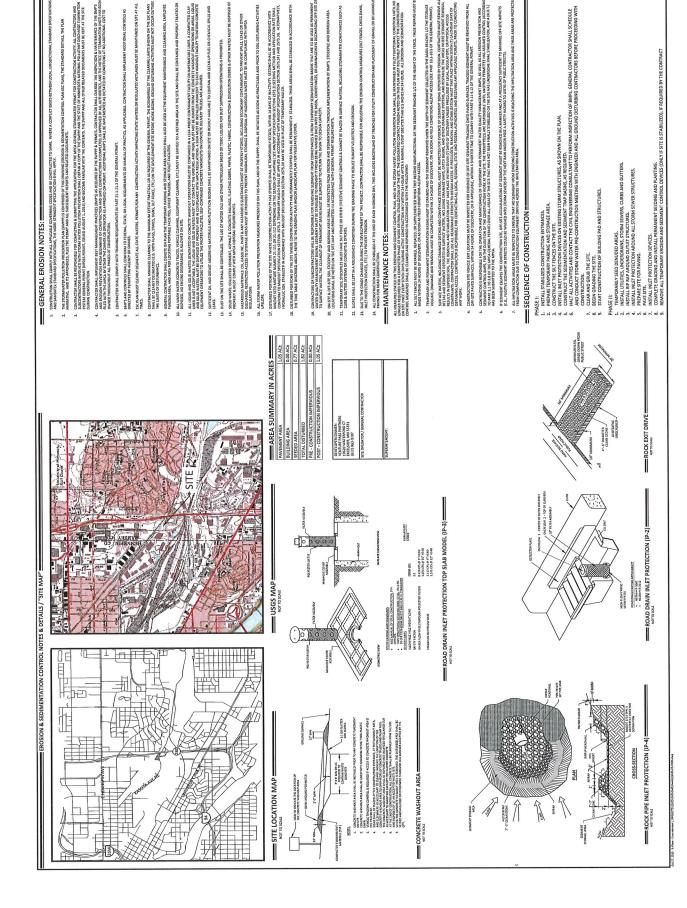
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INDUSTRIES TRAILER STORAGE ROHN

MINNESOTA 2495 KASOTA AVENUE Location ST PAUL,

Certification

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Project ROHN INDUSTRIES TRAILER STORAGE

Location
ST PAUL,
MINNESOTA
2495 KASOTA AVENUE

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INDUSTRIES TRAILER ROHN

MINNESOTA 2495 KASOTA AVENUE Location ST PAUL,

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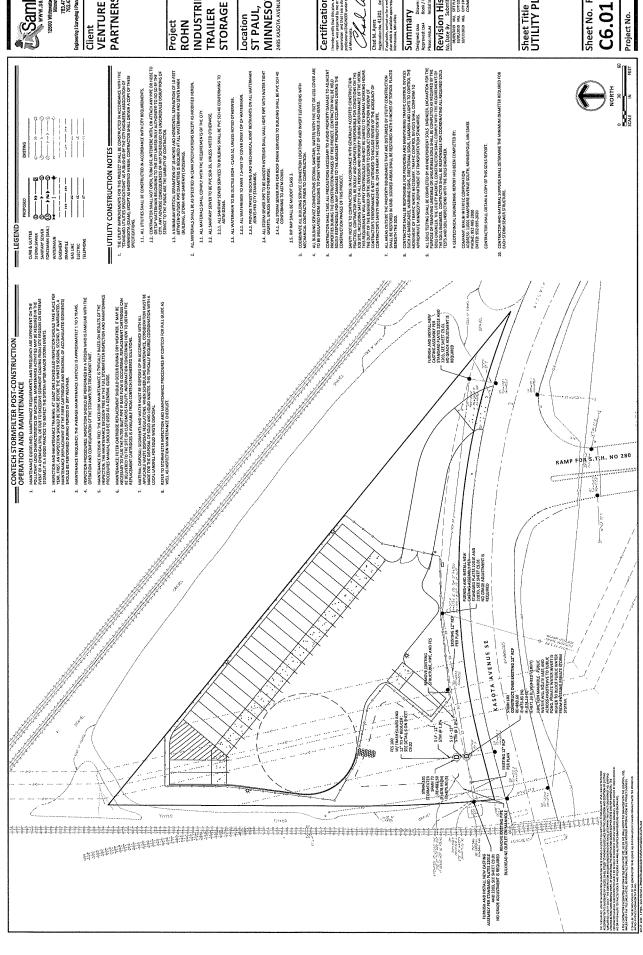
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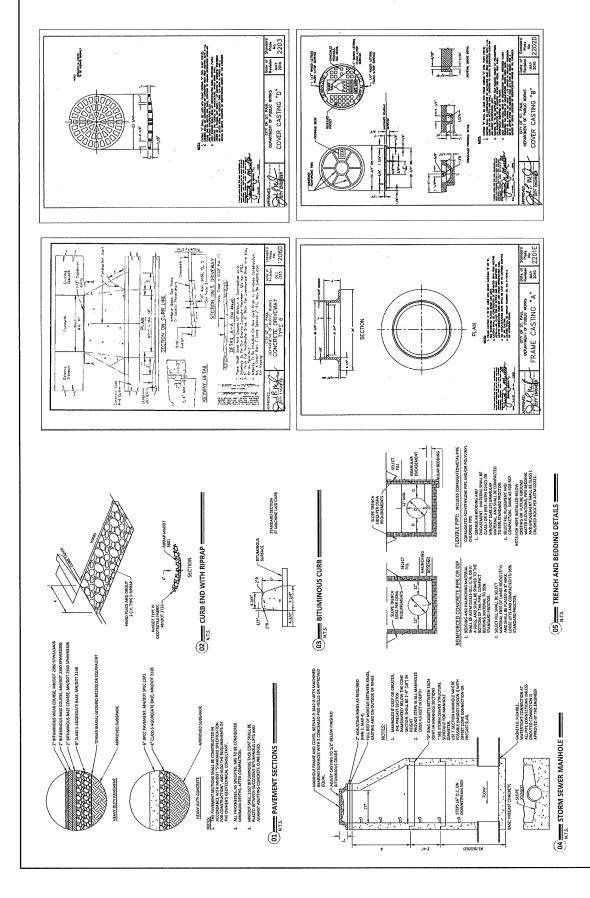
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INDUSTRIES TRAILER STORAGE Project ROHN

Location
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2495 KASOTA AVENUE

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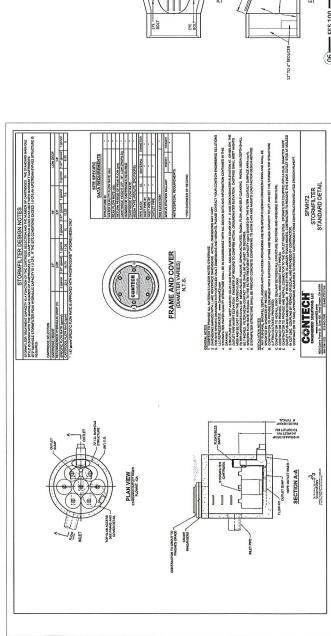
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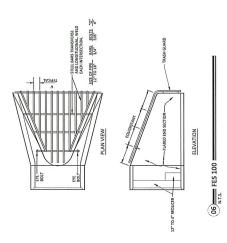
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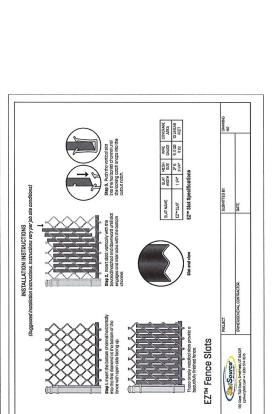


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I hereby certify that this plan, specification or report was prepared by me or under my direct supervision and that I am a duly licensed professional ENGINEER under the laws of the st of Minnesota.

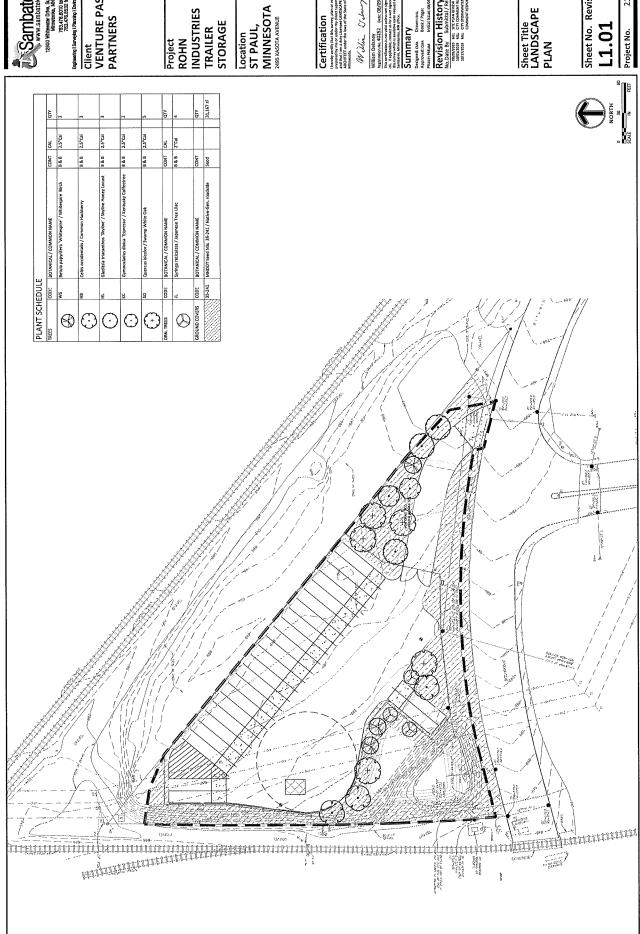
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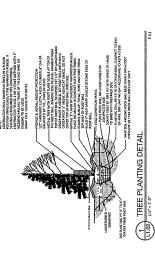
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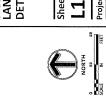
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Saint Anthony Park Community Council Appeal of SPR File # 19-075478 Proposed Rohn Industries development at 2495 Kasota Avenue October 22, 2019

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.

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

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.

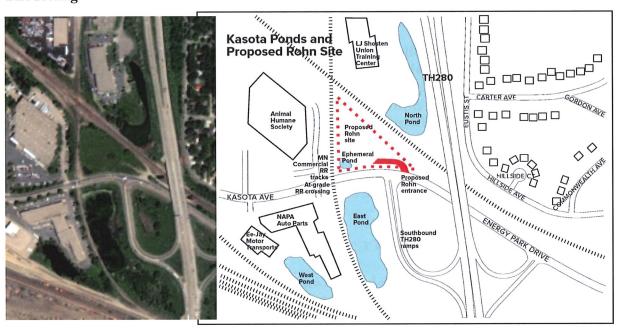
Summary of the grounds for SAPCC's opposition:

- 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

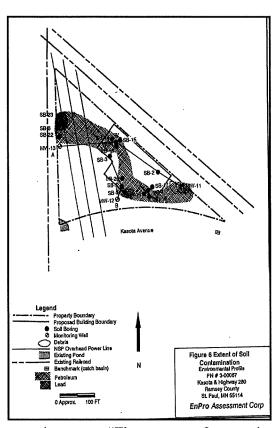
In agricultural situations, soil scientists and agricultural extension agents recommend that farmers or their consultants obtain representative soil samples for nutrient analysis. Based on years of University and Federal research, the Natural Resources and Conservation Service recommends that a large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

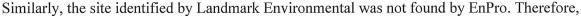
An example is the estimated pattern of petroleum contamination and three distinct sites of lead contamination in this map, submitted in 1996 by EnPro Assessment Corp (p.587, Final Phase I ESA).

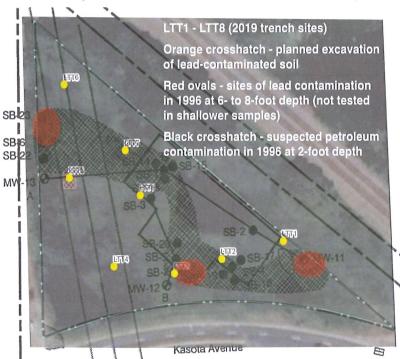
During the Limited Phase II Investigation in 2019 (Voluntary Response Action Plan), Braun Intertec had eight trenches (referred to as "test pits" by Braun) dug on the site, no closer than about 50 feet apart, and they also took six soil borings to depths of 25 to 80 feet. Such sampling is appropriate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



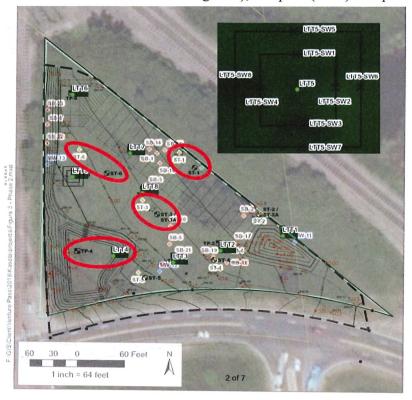


the sampling conducted thus far on this highly variable, demonstrably contaminated site, has been inadequate. In this composite map from the EnPro report and the Final VRAP report by Landmark Environmental, it is clear that Landmark Environmental paid inadequate attention to previous soil coring campaigns, 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 Hadiaris (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 Hadiaris (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 Hadiaris 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

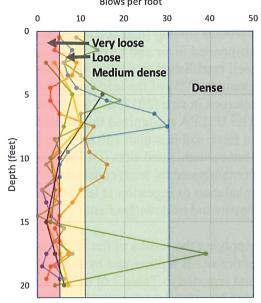
In addition, from the time the vegetation is removed before land shaping until the remaining permeable surfaces are revegetated and that vegetation is transpiring significant amounts of water—two or more years— more rainfall will be absorbed by the fill and more will percolate through to the perched 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

Karlyn 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.

Maria Karpinski 8 Ludlow Ave St Paul MN 55108

no to that action on kasota

already my wife who was not even 67, was diagnosed five months before death with acute pulmonary fibrosis. after all tests for genetics were ruled out, her biopsy confirmed environmental pollution from the fracking silica sand off the trains we live by Brueggers bagels.

leukemia and liver failure are from the methane on those big black round oil cars that sit on the tracks leaking that bad rotten egg smell.

Osha has listed three causes of death from fracking trains for folks living by them: acute pulmonary fibrosis leukemia

liver decline of which I was diagnosed now with and my wife's autopsy showed her liver four times the size it ought to have been.

My wife was healthy five months before her death, and her doctor ruled out all auto immune issues and genetics.

So more pollution? I think not. Too bad congress de regulated the states rights to stop train fracking running through and causing death.

Hi Amanda!

I currently live with my family at <u>2252 Folwell, Falcon Heights, MN 55108</u>. We are just a block north of the SAP neighborhood. My husband and I also own our former home at <u>2095 Selby Ave, St Paul, MN 55104</u>, so we are St. Paul property tax payers. Our children are ages 11, 7 and 3.

My husband and I in agreement with the SAPCC appeal. We are concerned about the known toxic pollutants that could be released into groundwater, etc. if this plot of land is developed. We urge the city to consider the SAPCC's position seriously and stop the development of <u>2495 Kasota</u>.

Thank you so much for your attention to this matter.

Bryan & Yesenia Anderson

dik Bolger dbolger@bolgerinc.com CEO

D 651-642-2923 M 612-759-3957

3301 Como Ave S. E. Minneapolis MN 55414

VISION BEYOND PRINT. BOLGERINC.COM

I own 2 businesses, printing, one on Como ave and one on Kasota. I also live in St Anthony Park. I received a flyer on my door asking me to oppose the Rohn Dev. The flyer really seems like over blown concerns to me. Assuming all of the normal precautions for building are done a business doing dry recycling should not be an environmental issue. All buildings in that area have had to contend with the ash from the past. The flyer simply seems like emotion not fact. One concern that should be addressed is the off ramp from 280 onto Kasota. It is currently very dangerous for left turns. Additional truck traffic will increase the problem. A stop light or a stop sign on Kasota would help.

Fill me in if I am missing something. Bolger recycles everything in its production facilities and Rohn has been a vendor.

Hello Dik-

The proposed development has received a No Association Determination Letter from the MPCA, in addition to approved Response Action Plan and Construction Contingency Plan. The Minnesota Department of Health issued at Letter Health Consultation indicating the proposed development does not pose a public health hazard.

The applicant provided a traffic narrative to the city dated 9/26/19. This narrative identified a defined traffic pattern between the main site at 862 Hersey Street and the proposed development at 2495 Kasota Avenue. Ingress to the site will be from the east via Energy Park Drive, egress from the site will be towards the west via Energy Park Drive, and there is no proposed use of MNTH280. Turning movement exhibits for a 53-foot trailer (WB 67) and fire truck were required and provided. The driveway entrance will allow adequate space for trucks entering and exiting the site to queue on private property and not public right-of-way. The site plan shows space for 25 trailers, with a projection of 20 truck movements per day. The applicant noted that they employ their own drivers whom will be made aware of the traffic flow policy. The travel route within the traffic narrative dated 9/26/19 will become the standard operating procedure, and added to the driver's instructions.

On 10/17/19 city staff were notified in writing by MnDOT staff that the proposed driveway location at Energy Park Drive is MnDOT right of way, and therefore will require a MnDOT access permit. MnDOT staff indicated they are currently evaluating the intersection of Energy Park Drive and MNTH 280 ramps.

There is likely to be a traffic signal installed there in the future, but because MnDOT is still completing their evaluation, MnDOT could not provide information on precisely where and how the equipment will be located and configured. Based on this new information city staff and MnDOT staff have agreed that the access driveway should line up directly opposite the MNTH 280 ramps intersection. City Public Works staff will work with the applicant to review an updated design of the driveway entrance. The site plan will not be approved until it receives approval from city Public Works staff and a MnDOT Access Permit.

I hope this summarizes answers to your questions.

Would you like your comment below (along with your name/business address) included in the public record?

Amanda

Thanks for the clear communication. It seems to me that this should be approved despite the sky is falling neighborhood reaction. I do think the stop light is important. It is the traffic on energy park that causes the dangerous intersection. Pulling off the ramp with more energy park traffic will increase the danger. Please go ahead and use my comments. I felt Rohn was being unfairly maligned.

Dear Ms. Smith, I am writing to oppose the proposed development by Rohn Industries at 2495 Kasota. I live in the home I own at 2348 Hillside Avenue, in St. Anthony Park. My property abuts the commercial railway tracks that run just North of Kasota and I am within 1/2 mile of Hwy. 280. The noise and light pollution frequently make me miserable but even worse is the air quality- the dust accumulates faster than I can wipe it up, even when windows are closed. Neighbors with asthma often complain about their breathing problems, which they relate to the particles released into the air from trains and freeway traffic.

This area cannot handle anymore air pollution! The Rohn development should be stopped. I'll see you on Thursday at the hearing.

Best,

Rachel

Rachel Fang (she/her/hers)
PhD Candidate
University of Minnesota College of Design

Dear Ms. Smith,

I am concerned that the proposed Rohn Industries' semi-trailer parking facility 2495 Kasota Ave will expose toxins from the historic ash dump underneath. This is especially concerning given that there's a wetland across the street.

Sincerely, Cynthia Putz-Yang 1136 Raleigh Street

Amanda,

I am opposed to the development of the 2495 Kasota Ave site as proposed by Rohn Industries.

I live less than 1/4 mile from Kasota Pond, which is across Kasota from the proposed project, but more importantly not only are there many families in North and South St Anthony Park whose air quality will be threatened, but the wildlife that lives in the ponds and around the site will be endangered. There are numerous migratory bird species, established heron nests, raptors, 3 species of turtles, fox, and literally thousands of terrestrial and aquatic invertebrate species inhabiting the area surrounding the site that are critical to the health and integrity of this area.

Given the history of the land use at this site over decades, including the historic Elm Street Ash Dump, the ground is already contaminated and any development will disturb and open up the substrate exposing the heavy metals, medical waste and other hazardous materials documented to be present there. The ponds will simply be unable to sustain the life found there when impacted with the inevitable runoff water.

In addition, the increased vehicular congestion along this already busy stretch of road, along with the bike commuter traffic, will make for safety issues. Currently traffic often backs up as drivers wait to enter and exit Hwy 280 ramps.

Please submit my comments in opposition to the approval of this site plan for 2495 Kasota Ave.

Thank you, Margot Monson

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Margot Monson, MS Entomology, Beekeeper 22 Ludlow Ave. St.Paul, MN 55108 651-644-3749 Aside from likely contamination issues, my visual world is very important to me. That entrance, one I frequently use, and especially highway 280 is already pretty junky and cheap looking, largely due to the billboards. If anything, we should be trying it more attractive not less.

Robin Fox 1505 Hythe St St Paul, MN As a long-time resident of the lower part of St. anthony Park area my husband and I absolutely do not want to live with any more potentially dangerous polluting industries.

It is enough having to suffer the concrete dust from Cemstone on Energy Park Drive that is being blown all the way across to us on Brewster Street whenever the wind comes from the south west. We also have to live with the various pollutants that are coming from the railroad yard (diesel soot being just one of them). And last but not least we have to live with several chemical industries on Energy Park Drive that spell potential disasters (including fires and explosions) and in all likelihood send all kinds of pollutants into the air we breathe on a daily basis.

My husband has chronic respiratory problems and uses an inhaler almost on a daily basis. Of course, there is no way of proving that this is the result from the bad air we are breathing, but I am convinced it is. Whenever I wipe around our windows or the white aluminum of our sun porch I come away with a cloth that's covered in fine gray concrete dust. If it settles onto our window sills, it also gets into our lungs!

Susanne Nevin 2278 Brewster Street Saint Paul MN 55108 Ms. Smith,

I am disturbed by the development plan for 2594 Kasota. A plan that will negatively impact our neighborhood's air quality is unacceptable.

I am also disturbed that the city doesn't seem to be listening to our neighborhood council. They represent the residents of St. Anthony Park. The City Council didn't listen to city residents who signed a petition to put the garbage hauling plan on the ballot. I hope that there isn't a pattern developing of the Council pushing ahead agenda items when citizens have raised reasonable objections.

Mary Pat Dunlap 1399 Raymond Avenue St. Paul MN 55108 change.org

Sign the Petition

2 minutes

St. Anthony Park Community Council has many serious concerns about the potential air/waterborne pollutants that could manifest at the Rohn Industries <u>2495 Masota Ave. project</u> because an old ash dump underlies this site. We are also concerned with the traffic congestion this project would add to our neighborhood and the safety issues it would cause.

The plan intends to excavate and stockpile topsoil on site, which will clearly disturb the historic Elm Street Ash Dump and expose the underlying polluted material (air, water and subsoil leachate plumes). It contains tons of partially incinerated hospital waste from HCMC, and ash from the City of Minneapolis and the U of MN, and dating from the 1930s to the 1960s.

City staff have ignored SAPCC and the neighborhood's concerns related to safety as well as our site-specific technical knowledge and history about this complex site in the review process, granting Conditional Approval 9/16/19. At a minimum, the site should remain undisturbed. Ideally, it should be remediated (the removal of all contaminated materials) and restored to its original wetland condition.

If you feel that approving the Rohn project poses significant danger to human health due to toxins released, please add your name and contact information to the petition and donate to the <u>appeals fund</u>.

Comments

Name	Location	Date	Comment
Rachel Fang	Saint Paul, MN	2019-09-26	"I live in the neighborhood and I am concerned about this development"
Andrew Jacob	Saint Paul, MN	2019-09-26	"This site as capped for a reason. Developing it is dangerous to neighbors in an increasingly residential area, as well as to anyone who relies on the groundwater in the area — which is all of us. Do not develop this land."
Natalie Koness	Fridley, MN	2019-09-26	"Got to keep it clean."
Michael Russelle	Saint Paul, MN	2019-09-26	"This site is completely inappropriate to develop. The incinerator ash should not be exposed to wind, runoff, or leaching. I am very happy the Community Council is appealing!"
Lori Shimer	Minneapolis, MN	2019-09-26	"I live in this neighborhood and I'm concerned about toxic pollution in a growing residential area. This neighborhood has parks, playgrounds, homes, and community gardens. We do not want or need this hazardous development."
Hilary Johnson	Saint Paul, MN	2019-09-27	"It is time Saint Paul leadership listen to their constituents instead of favoring 'industry', the contamination alone should have been enough to stop this project in its tracks."
Nancy Peterson	St. Paul, MN	2019-09-27 .	"Isolate the waste or remediate it, but DO NOT go forward with the Rohn project."
Diana Yefanova	St. paul, MN	.' 2019-09-27	"It is dangerous and unwise"
Nicole Bell	Minneapolis, MN	2019-09-27	"I strongly oppose this project. I live close by and worry that development of this site would cause harm to people, animals, and the environment in the area. This site should not be developed."
Philippe Gallandat	Saint Paul, MN	2019-09-28	"I trust Diana Yefanova' judgement"
Nicole Pierce	Minneapolis, MN	2019-09-30	"As usual the ramifications of a development like this in a residential area shows no thought or care for the effects on the people and animals who live there."
Valerie Green	Missouri	2019-10-01	"There are multiple detriments to this development: disturbing and exposing the toxic waste to neighbors, potential damage to the current wetlands and increase semi trailer truck noise. We need more green, quiet space."
Patricia Thompson	Saint Paul, MN	2019-10-01	"What does the MWMO say about this plan? Have they approved it? I doubt it."
Michele Young	Minneapolis, MN	2019-10-02	"I know of too many folks from this area that their families have already suffered from this waste - no more."

Name	Location	Date	Comment
Joanne Lidicker	Minneapolis, MN	2019-10-03	"The concerns in the petition sound valid to me, and have not been adequately addressed. The city needs to "show their work" here; What is their answer to the concerns about potential hazards?"
Paul Von Drasek	Saint Paul, MN	2019-10-03	"This activity would be very expensive to undo."
kathleen clark	Saint Paul, MN ·	2019-10-03	"there is a pond by the Midway leaf drop off place, that always had lots of birds, ducks, until a company put a pipe to the pond for water run off ect This effected the pond that as been there many years. SAD"
Amy Engebretson	St Paul, MN	2019-10-08	"I believe we need to be responsible with our waste, and thoughtful about what we do with our land."
halle ofalvey	st paul, MN	2019-10-16	"Our watersheds are just as important if not more than our bodies of water."
Carol Hauser	Minneapolis, MN	2019-10-17	"Life is too precarious for another ill conceived project further damaging our inner city neighborhoods. Infrastructure rehabilitation a better investment for future City life/lives."
Jane Hubbard	Tucson, AZ	2019-10-17	"My sister and brother-in-law live in this neighborhood and would be affected."

Signatures

Name	Location	Date
Kathryn Murray	US.	2019-09-25
Hal Dragseth	Milaca, MN	2019-09-25
Emma Lee	Saint Paul, MN	2019-09-25
Perry So	Saint Paul, MN	2019-09-25
Anna Graber	Saint Paul, MN	2019-09-25
Walker Johnston	Saint Paul, MN	2019-09-25
Alice Neve	Saint Paul, MN	2019-09-25
Mimi JENNINGS	Saint Paul, MN	2019-09-25
Rebecca Penovich	St. Paul, MN	2019-09-25
austin ward	Albany, OR	2019-09-25
Elizabeth Reed	Minneapolis, MN	2019-09-25
Leslie Rebollar	Santa Ana, US	2019-09-25
Elizabeth Baur	Saint Paul, MN	2019-09-25
Elena Izaksonas	Saint Paul, MN	2019-09-25
Brent Hagen	Saint Paul, MN	2019-09-26
Anna Pease	St. Paul, MN	2019-09-26
Ryan Van Schyndel	Saint Paul, MN	2019-09-26
Rachel Fang	Saint Paul, MN	2019-09-26
Sherman Eagles	Saint Paul, MN	2019-09-26
Lynn Bieri	Saint Paul, MN	2019-09-26

· .	•	
Name	Location	Date
Lisa Habeck	Saint Paul, MN	2019-09-26
Mark Gudmastad	St. Paul, MN	2019-09-26
Laura Park	St. Paul, MN	2019-09-26
Eva Neubeck	Minneapolis, US	2019-09-26
Robert Straughn	Saint Paul, MN	2019-09-26
cynthia pitts	antwerp, US	2019-09-26
susan conner	Saint Paul, MN	2019-09-26
David Healy	St. Paul, MN	2019-09-26
Gail Sorensen	St. Paul, MN	2019-09-26
Patricia Thompson	Saint Paul, MN	2019-09-26
Theodore Lee	Saint Paul, MN	2019-09-26
Vicki Sharp	Kenton, US	2019-09-26
Ralph Wyman	Minneapolis, MN	2019-09-26
Janet Lawson	Saint Paul, MN	2019-09-26
Michael Russelle	Saint Paul, MN	2019-09-26
Andrew Jacob	Saint Paul, MN	2019-09-26
Steve Ray	Saint Paul, MN	2019-09-26
John Connell	Saint Paul, MN	2019-09-26
Brianne Gossman	Saint Paul, MN	2019-09-26
Colette Ricci	St. Paul, MN	2019-09-26
Diane Cushman	Prospect Park, MN	2019-09-26
Natalie Koness	Fridley, MN	2019-09-26

Name	Location	Date
M Sandmeier	Saint Paul, MN	2019-09-26
Joseph Gibson	Loganville, US	2019-09-26
Brian Irvine	St. Paul, MN	2019-09-26
Shanan Seeler	St. Paul, MN	2019-09-26
James Kohls	Saint Paul, MN	2019-09-26
Ryder Seeler	Saint Paul, MN	2019-09-26
Steven Yetter	St. Paul, MN	2019-09-26
Mary Mergenthal MERGENTHAL	Saint Paul, MN	2019-09-26
Tim Holly	Saint Paul, MN	2019-09-26
C LAWSON	Saint Paul, MN	2019-09-26
Carrie Gleason	Sedalia, US	2019-09-26
William Lorimer	Saint Paul, MN	2019-09-26
Catherine Day	Saint Paul, MN	2019-09-26
Elizabeth Lightfoot	Saint Paul, MN	2019-09-26
Mindy Keskinen	Saint Paul, MN	2019-09-26
Mya Hummel	Saint Paul, MN	2019-09-26
Lori Shimer	Minneapolis, MN	2019-09-26
Sue Wick	Saint Paul, MN	2019-09-26
Len Jennings	Saint Paul, MN	2019-09-26
Adam Kaluba	Cincinnati, US	2019-09-26
Hannah Gray	Saint Paul, MN	2019-09-26

Name	Location	Date
Barbara Becker	Saint Paul, MN	2019-09-26
karen rom-kormann	Saint Paul, MN	2019-09-26
Hilary Johnson	Saint Paul, MN	2019-09-27
stephen mastey	St. Paul, MN	2019-09-27
Amie Kranz	Red Wing, MN	2019-09-27
Nancy Peterson	St. Paul, MN	2019-09-27
haley nelsestuen	Galesville, WI	2019-09-27
Susan McCarthy	Saint Paul, MN	2019-09-27
Jesse Wochos	La Crosse, WI	2019-09-27
Gene Marault	Saint Paul, MN	2019-09-27
Peter Currie	Saint Paul, MN	2019-09-27
Betty Wheeler	Saint Paul, MN	2019-09-27
Ashley Hendry	Elon, NC	2019-09-27
Diane Landis	Saint Paul, MN	2019-09-27
Elisabeth Currie	Saint Paul, MN	2019-09-27
Jay Johnson	St Paul, MN	2019-09-27
Diana Yefanova	St. paul, MN	2019-09-27
i hateniggers	Raleigh, US	2019-09-27
Milanda Landis	Minneapolis, MN	2019-09-27
Matt Wildenauer	Saint Paul, MN	2019-09-27
Ann Commers	Minneapolis, MN	2019-09-27
Kim Nichols	Saint Paul, MN	2019-09-27

Name	Location	Date
Paige Wildenauer	Minneapolis, MN	2019-09-27
Kimberly Starnes	Saint Paul, MN	2019-09-27
Samuel David	Saint Paul, MN	2019-09-27
Amy Fletcher-Brewer	St. Paul, MN	2019-09-27
Jennifer Mulcahy	Saint Paul, MN	2019-09-27
Patrick Horrigan	Saint Paul, MN	2019-09-27
John Maurer	Saint Paul, MN	2019-09-27
Carla Asleson	Saint Paul, MN	2019-09-27
Mavis Straughn Straughn	Saint Paul, MN	2019-09-27
Dericka Parker	Fayette, US	2019-09-27
Catherine McKay	Saint Paul, MN	2019-09-27
Michael VanKeulen	Minneapolis, MN	2019-09-27
Mileeza Evans	Hermanville, US	2019-09-27
Abby Berry	Plymouth, MN	2019-09-27
Nicole Bell	St Paul, MN	2019-09-27
Sue Stacey	Saint Paul, MN	2019-09-27
Shawn Pioske	Minneapolis, US	2019-09-27
L. Christopherson	Saint Paul,, MN	2019-09-27
Margot Monson	Saint Paul, MN	2019-09-28
Jeff Christopherson	Saint Paul, MN	2019-09-28
Kevin Commers	Saint Paul, MN	2019-09-28
Philippe Gallandat	Saint Paul, MN	2019-09-28

Name	Location	Date
Richard Taraso	Topeka, US	2019-09-28
Lilian Grieco	West Palm Beach, US	2019-09-28
Alden Hoffman	St Paul, MN	2019-09-28
Adam Holm	St Paul, MN	2019-09-28
Mary Boyd-Brent	Saint Paul, MN	2019-09-28
Tara Thompson	St Paul, MN	2019-09-28
Dennis Ormseth	Saint Paul, MN	2019-09-28
Kerry Bollman	St. Paul, MN	2019-09-28
Maria Cavros	Cedar Rapids, US	2019-09-28
Taylor Samsel	Austin, US	2019-09-28
Bob Ebnet	Kerkhoven, US	2019-09-28
Piperi Gilo'	Minneapolis, MN	2019-09-28
Christine Moreau	Arlington, US	2019-09-28
Yajaira Alvarez	Belmont, US	2019-09-28
Beverly Ramirez	Lake Elsinore, US	2019-09-29
Marilee Haukos	Chokio, US	2019-09-29
dolores burke	castro valley, US	2019-09-29
Meg Kersey-Isaacson	Saint Paul, MN	2019-09-29
Kari Untalan	Milbank, US	2019-09-29
Gabi S	Tenafly, US	2019-09-29
Ami Lobue	San Diego, US	2019-09-29
Trinity Adams	Riverside, US	2019-09-29

Name	Location	Date
Meagan Grissom	Clinton, US	2019-09-29
JULIA LOUPE	Falcon Heights, MN	2019-09-29
Victoria Huynh	San Diego, US	2019-09-29
Jessica Romo	Everett, US	2019-09-29
Nicole Kendorski	Collegeville, US	2019-09-29
Rebecca Robinette	Columbia, MD	2019-09-29
theresa ward	Far Rockaway, US	2019-09-29
Aziri Dosmas	Brooklyn ny, US	2019-09-29
Katrina Cribbs	US	2019-09-29
Jo Ann Westaway	Tallahassee, US	2019-09-29
Jonathon Keller	Mansfield, US	2019-09-29
Gretchen Walker	Saint Paul, MN	2019-09-29
Toburg Abolph	Heber, US	2019-09-29
diane young	LOS ANGELES, CA	2019-09-29
Trustin Standage	Salt Lake City, US	2019-09-29
Grace Larson	Olivia, US	2019-09-29
Josephine Snow	Owatonna, US	2019-09-29
Dalton Vanhorn	Lakeland, US	2019-09-29
Kerry Petz	arnold, US	2019-09-29
Adriana Quintero	Tujunga, US	2019-09-29
Mu Su	Saint Paul, US	2019-09-29
Jana Johnson	Minneapolis, MN	2019-09-30

Name	Location	Date
Daniel Millis	Albuquerque, US	2019-09-30
Victoria Shih	Plano, US	2019-09-30
Marlene Becker	Woodbury, VA	2019-09-30
Bill Moerbe	Sedelia, US	2019-09-30
Michael McCormick	Edina, US	2019-09-30
Melissa Heithaus	Mckinney, US	2019-09-30
sherri hodges	Phoenix, US	2019-09-30
Barbara Coffin	Saint Paul, MN	2019-09-30
Kristal Leebrick	Minneapolis, MN	2019-09-30
Bryn Manion	Los Angeles, CA	2019-09-30
Grace Bell	Saint Paul, MN	2019-09-30
Rita Goodrich	St Paul, MN	2019-09-30
Deborah Imelmann	Saint Paul, MN	2019-09-30
John Schroder	Saint Paul, MN	2019-09-30
Jessica Jernigan	Key Largo, US	2019-09-30
Allie Rykken	Saint Paul, MN	2019-09-30
Janet Dieterich	Saint Paul, MN	2019-09-30
Shawna Maryanovich	Saint Paul, MN	2019-09-30
Kim Holman	Saint Paul, MN	2019-09-30
May Bazzi	Dearborn, US	2019-09-30
Tim Wulling	Saint Paul, MN	2019-09-30
Ann Schroder	Saint Paul, MN	2019-09-30

Name	Location	Date
Michael Beattie	Minneapolis, MN	2019-09-30
Bradley Fesler	Saint Paul, MN	2019-09-30
Jill Galstad	Saint Paul, MN	2019-09-30
Pam Fischer	Saint Paul, MN	2019-09-30
Kevin Morrison	Saint Paul, MN	2019-09-30
Reade Adams	Saint Paul, MN	2019-09-30
Nicole Pierce	Minneapolis, MN	2019-09-30
DANIEL DROPIK	Saint Paul, MN	2019-09-30
Audrey Almo	Minneapolis, MN	2019-10-01
Chris Collin	Minneapolis, MN	2019-10-01
Jack Steinmann	Saint Paul, MN	2019-10-01
Mary Pogatshnik	Saint Paul, MN	2019-10-01
Sarah Clark	Saint Paul, MN	2019-10-01
Mary Sage Sennewald	Saint Paul, MN	2019-10-01
Brooke Peterson	Saint Paul, MN	2019-10-01
Gregory Dawkins	Rockingham, US	2019-10-01
Victoria Erhart	Saint Paul, MN	2019-10-01
Steven Kranz	Saint Paul, MN	2019-10-01
chuck tracy	Saint Paul, MN	2019-10-01
Virginia Kranz	Saint Paul, MN	2019-10-01
B Gorringe	Minneapolis, MN	2019-10-01
Clay Williams	Saint Paul, MN	2019-10-01

Name	Location	Date
Jeremy Lundquist	Saint Paul, MN	2019-10-01
Jess Olson	Saint Paul, MN	2019-10-01
Barbara Cain	Saint Paul, MN	2019-10-01
Soo Kang	Saint Paul, MN	2019-10-01
Keanon Patrick	Minneapolis, MN	2019-10-01
Rebecca Cassidy	St.Psul, MN	2019-10-01
Rob Johnson	Saint Paul, MN	2019-10-01
Mollie Hoben	Saint Paul, MN	2019-10-01
Yvonne Godber	St Paul, MN	2019-10-01
Kathy Magnuson	Saint Paul, MN	2019-10-01
Emily Blodgett	Moultonborough, NH	2019-10-01
Ellen Watters	Saint Paul, MN	2019-10-01
John Schroeder	Saint Paul, MN	2019-10-01
Liam Stewart	Saint Paul, MN	2019-10-01
Chris Koehler	Minneapolis, MN	2019-10-01
Susan McCabe	Minneapolis, MN	2019-10-01
Robin Fox	Saint Paul, MN	2019-10-01
Lawmchhunga Khawlhring	Battle Creek, US	2019-10-01
Allanna Skoogman	Saint Paul, MN	2019-10-01
JoAnne Makela	Minneapolis, MN	2019-10-01
Valerie Green	Saint Paul, MN	2019-10-01
Tobin Moon	Idaho falls, US	2019-10-01

Name	Location	Date
Joel Larson	Saint Paul, MN	2019-10-01
joel armas	Miami, US	2019-10-01
Mary Radtke	Saint Paul, MN	2019-10-01
Susan Sturm	Saint Paul, MN	2019-10-01
Robert Herman	Saint Paul, MN	2019-10-01
Regan Golden	Saint Paul, MN	2019-10-01
wayne sisel	Saint Paul, MN	2019-10-01
Lynne Hessler	Saint Paul, MN	2019-10-01
zoe t	Mckees Rocks, US	2019-10-01
Shauna McHugh	Kapolei, US	2019-10-01
max paul	Orlando, US	2019-10-01
Elizabeth Pierce	Saint Paul, MN	2019-10-01
tom tangney	Saint Paul, MN	2019-10-01
Joan Laux	Saint Paul, MN	2019-10-01
Lawrence & Susan Sheets	Saint Paul, MN	2019-10-01
Timothy Whiting	Orlando, US	2019-10-01
Thomas Herbers	Saint Paul, MN	2019-10-01
IA AI	Gales Ferry, US	2019-10-01
Yesenia Anderson	Falcon Heights, MN	2019-10-01
Neill Merck	Saint Paul, MN	2019-10-01
Elizabeth Faust	Saint Paul, MN	2019-10-01
Robert Hoag	Kansas City, US	2019-10-01

Name	Location	Date
Jojie Geronimo	Kekaha, US	2019-10-01
Karen Williams	St Paul, MN	2019-10-02
Joshua Richards	Jamaica, US	2019-10-02
Ann Bechtell	Minneapolis, MN	2019-10-02
ginner ruddy	Saint Paul, MN	2019-10-02
Alexis Scott	Saint Paul, MN	2019-10-02
Lisa Olson	Saint Paul, MN	2019-10-02
Cadon Fullmer	Idaho Falls, US	2019-10-02
Zack Wilson	Georgetown, US	2019-10-02
Benny Acevedo	Pleasantville, US	2019-10-02
Paul Durkee	Saint Paul, MN	2019-10-02
Christian Schutz	Saint Paul, MN	2019-10-02
Mary Maguire Lerman	Saint Paul, MN	2019-10-02
Jason Kerwin	Falcon Heights, MN	2019-10-02
jan weber	Saint Paul, MN	2019-10-02
Diana Eicher	Minneapolis, MN	2019-10-02
Earl Howard	Grand Rapids, US	2019-10-02
Pat Alexander	Newport, MN	2019-10-02
Nadine Horchner	Saint Paul, MN	2019-10-02
Kyle Bantz	Saint Paul, MN	2019-10-02
Aaron Arvold	Saint Paul, MN	2019-10-02
Carrie Asmus	St. Paul, MN	2019-10-02

Name	Location	Date
Evelyn vernon	Saint Paul, MN	2019-10-02
Tom Koors	Minneapolis, MN	2019-10-02
Michael Poarch	Fayetteville, US	2019-10-02
Ann Juergens	Saint Paul, MN	2019-10-02
Brenda Boily-Salmanpour	Minneapolis, MN	2019-10-02
Anne Hibbard	Minneapolis, MN	2019-10-02
Maria Jollie	Minneapolis, MN	2019-10-02
dawn bove .	Minneapolis, MN	2019-10-02
Christine Nielsen	Minneapolis, MN	2019-10-02
Ryan Caldwell	Boston, US	2019-10-02
Erik Skjon	Saint Paul, MN	2019-10-02
Lizbeth Torres	Salt Lake City, US	2019-10-02
Bonnie Stockhaus	Minneapolis, MN	2019-10-02
Christopher Reeves	Saint Paul, MN	2019-10-02
Jessie Bryan	Minneapolis, MN	2019-10-02
Mary Nord	Saint Paul, MN	2019-10-02
Ann Stout	Saint Paul, MN	2019-10-02
Arlene Zuckerman	Jamaica, US	2019-10-02
James Stout	Saint Paul, MN	2019-10-02
Gary Gerst	Saint Paul, MN	2019-10-02
Ann Sisel	St. Paul, MN	2019-10-02
Colleen Healy	Saint Paul, MN	2019-10-02

Name	Location	Date
Gregory Dana	Saint Paul, MN	2019-10-02
Hope Waugh	Jackson, OH	2019-10-02
M. B. Kennedy	Seattle, US	2019-10-02
Becky Hodgens	Travelers Rest, US	2019-10-02
Helen Foster	Saint Paul, MN	2019-10-02
Valerie Kyllo	Saint Paul, MN	2019-10-02
Nancy Gehrig	Saint Paul, MN	2019-10-02
Watson Ivey	High Point, US	2019-10-02
Charlotte Osborn	St. Paul, MN	2019-10-02
julie buffalohead	Saint Paul, MN	2019-10-02
Mark Winder	Tuttle, OK	2019-10-02
Christopher Krivanek	Saint Paul, MN	2019-10-02
Nate Flink	Saint Paul, MN	2019-10-02
Bally Sacky	Bronx, US	2019-10-02
Camille LeFevre	St. Paul, MN	2019-10-02
elizabeth hallowell	saint paul, MN	2019-10-02
Arthur Christopherson	Saint Paul, MN	2019-10-02
Jerry Starkey	Falcon Heights, MN	2019-10-02
Rommel Lachapelle	Stamford, US	2019-10-02
Becky Steeber	Saint Paul, MN	2019-10-02
Michele Young	Minneapolis, MN	2019-10-02
Lynne Murphy	Saint Paul, MN	2019-10-02

Name	Location	Date
Ra Godollei	Saint Paul, MN	2019-10-02
Melissa Tomalin	Miami, US	2019-10-02
Karlyn Eckman	Saint Paul, MN	2019-10-02
Michael Gann	Nashville, US	2019-10-02
Sylvia ring	Cameron, US	2019-10-02
JILL Pavlak	Saint Paul, MN	2019-10-02
Catreena Strait	Springfield, US	2019-10-02
Mark Larson	St.Paul, MN	2019-10-02
Brady Watson	Murfreesboro, TN	2019-10-03
Gary Stelzer	OKLA.CITY, US	2019-10-03
Shane Dann	Ellerbe, US	2019-10-03
Christy Myers	Saint Paul, MN	2019-10-03
Daniel Kern	Herrin, US	2019-10-03
Robert Grim	Rockford, US	2019-10-03
Rosann Cahill	Saint Paul, MN	2019-10-03
Virgil Larson	Saint Paul, MN	2019-10-03
Jose Chavira	Irving, US	2019-10-03
Ericha Gudmastad	Saint Paul, MN	2019-10-03
Tracy Kugler	Saint Paul, MN	2019-10-03
Lizzie Dzielski	Bartlett, US	2019-10-03
Joanne Lidicker	Minneapolis, MN	2019-10-03
Kendra Lewis	Saint Paul, MN	2019-10-03

Name	Location	Date
Maryse Fan	Pomona, CA	2019-10-03
Wesley Trawick	Cottonwood, US	2019-10-03
Abby Marier	St. Paul, MN	2019-10-03
Paul Von Drasek	Saint Paul, MN	2019-10-03
John Horchner	Minneapolis, MN	2019-10-03
Rusty Olsen	Lehi, US	2019-10-03
Kilo Coopedge	Durham, US	2019-10-03
Debra Miller	Englewood, US	2019-10-03
David Faust	St Paul, MN	2019-10-03
Sonia Ellis	Saint Paul, MN	2019-10-03
Martin Schoen	St. Paul, MN	2019-10-03
Dan Stock	Saint Paul, MN	2019-10-03
kathleen clark	Saint Paul, MN	2019-10-03
Hugh Pruitt	Saint Paul, MN	2019-10-03
Katherine Eklund	Saint Paul, MN	2019-10-03
Verena Larson	St.Paul, MN	2019-10-03
Abigail Crouse	Saint Paul, MN	2019-10-03
Sonya Steven	Saint Paul, MN	2019-10-04
Matt Konerg	Issaquah, US	2019-10-04
Anthony Plez	Miami, US	2019-10-04
Maureen Muck	Buffalo, US	2019-10-04
Esther Hope	Saint Paul, MN	2019-10-04

Name	Location	Date
Laura Hawks	Wellington, US	2019-10-04
Madelyn Coble	De Pere, US	2019-10-04
Morgan Nichols	St. Paul, MN	2019-10-04
Brandon Quintana	Los Angeles, US	2019-10-04
Isabel Huizar	Las Vegas, US	2019-10-04
Waddy Boy	Marietta, US	2019-10-04
Christine Kwong	Saint Paul, MN	2019-10-04
keifer Sroka	Cedarburg, US	2019-10-04
Stephanie Curin	Weimar, CA	2019-10-04
Michael Bloyer	Saint Paul, MN	2019-10-04
Alonzo Dugan	Dallas, US	2019-10-04
Petra Leskanich	Fort Collins, US	2019-10-04
Linda Larkin	Pequannock, US	2019-10-04
DeLane Gibbs	Woodland, US	2019-10-04
Jacob Irving	Montgomery, US	2019-10-04
Jen Nicole	Bay Shore, US	2019-10-04
fathimath rishtha	Buffalo, US	2019-10-04
Kenneth Hammer	Williston, US	2019-10-04
Eric Estrada	Bishop, US	2019-10-04
Julie Ann James	Saint Paul, MN	2019-10-04
Jessica Boetcher	Gasport, US	2019-10-05
Hell no Hellno	Bordentown, US	2019-10-05

Name	Location	Date
Maggie Vazquez	Saint Paul, MN	2019-10-05
bf	NYC, US	2019-10-05
Susan Adkins	Colchester, US	2019-10-05
Bhalinder Pandher	Hayward, US	2019-10-05
Julie Grossman	Saint Paul, MN	2019-10-05
Carol Starkey	Saint Paul, MN	2019-10-05
Rey Vas	US	2019-10-05
Devon Gonzalez	Brookline, US	2019-10-05
Levi Anglin	Benson, US	2019-10-05
Y L Kwan	San Diego, US	2019-10-05
Venkat Yanumula	Clawson, US	2019-10-05
Karen Hovland	St Paul, MN	2019-10-05
Michele LaPorte	Schaumburg, US	2019-10-06
ur mom	Albert Lea, US	2019-10-06
Ariana Yanez	US	2019-10-06
Bülent Yazıcı	hi, US	2019-10-06
Amy Dailey	Saint Paul, MN	2019-10-06
Amulya Kasaraneni	Kansas City, US	2019-10-06
Charlotte Herman	Minneapolis, MN	2019-10-06
Nijanshee Kanabar	Atlanta, US	2019-10-06
peins muschie	i can't, US	2019-10-06
Ayla Vaughan	Purchase, US	2019-10-06

Name	Location	Date
Shane Inouye	Ewa beach, US	2019-10-06
Marcus Morgan	Fort Wayne, US	2019-10-06
Kelsi Stearns	US	2019-10-06
Mark Westray	Raleigh, US	2019-10-06
Hunter Norris	Raleigh, US	2019-10-06
Anonymous Person	Suwanee, US	2019-10-07
Dana Alachkar	Los angeles, US	2019-10-07
Amber Biermann	Sheboygan Falls, US	2019-10-07
Jim Pascale	E. Rockhill, US	2019-10-07
Anuragh Reddy Sama	Chicago, US	2019-10-07
Kaela Church	adrian, US	2019-10-07
Jullissa Quiroz	San Jose, US	2019-10-07
Jacky Urbina	US	2019-10-07
Cynthia Putz-Yang	St Paul, MN	2019-10-07
Mark Mayes	Charleston, US	2019-10-07
Kinsey Gautier	Vass, US	2019-10-07
aaaaaaaaaaaa bruh	Columbus, US	2019-10-07
Caren Jo Smith	West Hartford, US	2019-10-07
Luke Shelly	Lewiston, US	2019-10-07
Shirley Erstad	Saint Paul, MN	2019-10-08
Amy Engebretson	St Paul, MN	2019-10-08
Aye Yo	Brooklyn, US	2019-10-08

	Name	Location	Date
	Kat Campbell Johnson	Saint Paul, MN	2019-10-08
	Aurora Gracia	Oxnard, US	2019-10-08
	Michael Friedmann	Bronx, US	2019-10-08
	Alice Magnuson	Saint Paul, MN	2019-10-09
	Mary Ellen Nerney	Saint Paul, MN	2019-10-10
	Karen Kloser	Minneapolis, MN	2019-10-10
	Cheryl Mcrae	Elizabeth, US	2019-10-10
	Melissa Pappas	Saint Paul, MN	2019-10-11
	Scott Simmons	Minneapolis, MN	2019-10-11
	Nymph McNymphNymph	Burnsville, US	2019-10-11
·	Melissa thomas	Haerford, US	2019-10-12
	Karen Grabau	Minneapolis, MN	2019-10-12
	Jennifer Crabtree	Vail, US	2019-10-12
	Lilli Davis	Fortville, US	2019-10-13
	Cole Gibson	Estero, US	2019-10-14
	sue molstad	Saint Paul, MN	2019-10-14
	Colleen Lake	Saint Paul, MN	2019-10-15
	Tim Kramer	Saint Paul, MN	2019-10-15
	Stephen Sage	Saint Paul, MN	2019-10-15
	Cynthia Anderson	Saint Paul, MN	2019-10-15
	mike walley	Indianapolis, US	2019-10-15
	Emily Rodriguez	Saint Paul, MN	2019-10-15

Name	Location	Date
Ellen Benavides	Saint Paul, MN	2019-10-15
Dan Macintyre	Saint Paul, MN	2019-10-15
Mary Harrison	Minneapolis, MN	2019-10-16
Nancy Healy	St. Paul, MN	2019-10-16
Caprice Niccoli	Falcon Heights, MN	2019-10-16
maggie johnson	Minneapolis, MN	2019-10-16
Nishant Sahni	Minneapolis, MN	2019-10-16
Wendy Lane	St. Paul, MN	2019-10-16
Fred Foster	Saint Paul, MN	2019-10-16
Joan Abbas	Saint Paul, MN	2019-10-16
John Ingwalson	St Paul, MN	2019-10-16
halle ofalvey	st paul, MN	2019-10-16
Maria Karpinski	Saint Paul, MN	2019-10-17
Susan Schnasse	Saint Paul, MN	2019-10-17
Carol Hauser	Minneapolis, MN	2019-10-17
Brian Mclean	Saint Paul, MN	2019-10-17
Clare Beyersdorf	Sheboygan Falls, WI	2019-10-17
Marsha Milgrom	Saint Paul, MN	2019-10-17
Jane Hubbard	Tucson, AZ	2019-10-17
Michelle West	Minneapolis, MN	2019-10-17
YO MAMA	Providence, US	2019-10-17
Sushila Subba	Madison, US	2019-10-17

Name	Location	Date
Kiersten O	Verona, PA	2019-10-17
Mark Mabel	Saint Paul, MN	2019-10-18
Anaaaya Randa	Madison, US	2019-10-18
Rae Kellgren	St Paul, MN	2019-10-18
Hailey Silva	Narragansett, US	2019-10-18
Sammy Walkey	Needham, US	2019-10-19
Scott Jensen	Saint Paul, MN	2019-10-19
Cheryl Griffin	Saint Paul, MN	2019-10-19
Terease Pelfrey	Saint Paul, MN	2019-10-19
Glenn D Griffin	Saint Paul, MN	2019-10-20
Kenneth Linares	Garden Grove, US	2019-10-23
Cassia Myers	Norristown, PA	2019-10-23
Camila Jaimes	Belleview, US	2019-10-23
Jj Zerzan	Papillion, US	2019-10-23
Darnelle Rodgers	Caruthersville, US	2019-10-23
Bryn Post	Denver, CO	2019-10-23
Nancy Plagens	Saint Paul, MN	2019-10-23
Judy Hilderbrand	St. Paul, MN	2019-10-23
Catherine Ryan	Saint Paul, MN	2019-10-23
Thomas Hysell	Saint Paul, MN	2019-10-23
spencer collins	Murfreesboro, US	2019-10-23
Calee Cecconi	St. Paul, MN	2019-10-23

Name	Location	Date
Doran Wetzel	Saint Paul, MN	2019-10-23
Lin Aanonsen	Saint Paul, MN	2019-10-23
Tj Hine	Saint Clair Shores, US	2019-10-23
C. Krauze	Minneapolis, MN	2019-10-23
julia price	Fredonia, US	2019-10-23
Nick Madónna	West chester, US	2019-10-23
Shaina Sakrison	St. Paul, MN	2019-10-23
Mahva Jones	Saint Paul, MN	2019-10-23
nasia smith	spring hill, US	2019-10-23
Martha Duerr	St. Paul, MN	2019-10-23
Claudia Benitez	US	2019-10-23
Brandon Thomas	Cincinnati, US	2019-10-23
Richard Mueller	Saint Paul, MN	2019-10-23
William Beyer	Saint Paul, MN	2019-10-23
Elicia Rzepka	Buffalo, US	2019-10-23
JoEllen Driscoll	Chesapeake, US	2019-10-23
Rollie Temprana	Miami, US	2019-10-23
Francis Bulbulian	Saint Paul, MN	2019-10-23
Shane McAlinden	Riverview, US	2019-10-23
jabore jefferson	Spring, US	2019-10-23
Alex Schnegelsberger	Milford, US	2019-10-23
Lisa Van Der Pol	Minneapolis, MN	2019-10-23

Name	Location	Date
Khambia Clarkson	Marshalltown, US	2019-10-23
George Angelidis	Kalamazoo, US	2019-10-23
Giovana Mena	Miami, US	2019-10-23
Jackson Enoch	Spring Hill, US	2019-10-23
Hector Gutierrez	Miami, US	2019-10-23
malvis cervantes	miami, US	2019-10-23
Jerome Jones	Detroit, US	2019-10-23
Diego Molina	Miami, US	2019-10-23
Sherry Heier	Brooklyn, NY	2019-10-23
Kayla Torres	Salinas, US	2019-10-23
Aya Bouayaben	Miami, US	2019-10-23
Rawr Marchand blume	Miami, US	2019-10-23
Michael Blandford	falcon Heights, MN	2019-10-24
Teresa Chouanard	Saint Paul, MN	2019-10-24
Jash Correa	Elkridge, US	2019-10-24
Luis Picon	Dallas, US	2019-10-24
Juan Moran	Miami, US	2019-10-24
Pro Jared	US	2019-10-24
Matt Lee	Lansing, US	2019-10-24
Kardelen Fiallo	Miami, US	2019-10-24
Kevin Bustabad	Miami, US	2019-10-24
Anthiny Gandarilla	El Paso, US	2019-10-24

Name	Location	Date
Emmerson Reed	Eugene, US	2019-10-24
Mary Pat Dunlap	St Paul, MN	2019-10-24
Katherine Mabel	Saint Paul, MN	2019-10-24
Jessica Thomford	Saint Paul, MN	2019-10-24

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