St. Anthony Park Community Council 2395 University Ave. W., Ste. 300E Saint Paul, MN 55114

St. Anthony Park

Amanda Smith
Zoning Inspector III- Site Plan Review
Department of Safety and Inspections
375 Jackson St. Suite #220
Saint Paul, MN 55101

Re: Rohn Industries Semi-Trailer Parking - 2495 Kasota Ave

Dear Ms. Smith,

On behalf of the St. Anthony Park Community Council, I am writing to request a postponement of the site plan review for 2495 Kasota Ave. As it stands at this time, our board and committee members feel strongly that more time is needed to review this plan.

The Rohn proposal and their contractors seem to be completely unaware of the existence of the historic Elm Street Ash Dump and the previous history of investigation by MPCA. The ESAD at this site has never been remediated, but has been largely undisturbed for decades. The ESAD extends roughly from approximately 26th and Kasota in Minneapolis to TH280. It contains tons of partially incinerated hospital waste from HCMC, and ash from the City of Minneapolis and the U of MN, and dates from the 1930s to the 1960s. It was covered with topsoil when 280 was built, and developers were allowed to construct warehouses and other buildings on top of the ESAD. It intersects with the Valentine-Clark superfund site at the remediated Bridal Veil Creek site.

Members of our Environment Committee are greatly concerned with potential to damage the pond complex and possibly impact air quality and public health in surrounding communities. The plan intends to excavate soil and stockpile topsoil on site, which will clearly disturb and expose the underlying polluted material. How the underlying polluted material would be contained is not clear. There is also an ephemeral DNR-designated wetland on the SE corner of the property, which could be impacted if underlying materials are disturbed.

The plan seems to intend that stormwater would be diverted to the East pond. If stormwater is contaminated with the polluted subsoil, the pond would certainly be exposed to cadmium, mercury, boron, hospital waste, incinerator ash and other highly toxic substances.

The very short time for review is unacceptable and does not allow sufficient time to bring in technical experts with more knowledge than us. I spoke briefly with Doug Snyder, Executive Director of the Mississippi Watershed Management Organization, and am waiting to hear back

from the Minnesota Pollution Control Agency. The MWMO has been monitoring the wetlands adjacent and have plans for a hydrological study, which should be done in about six months, and could then do a water quality impact study of the area. Mr. Snyder was clear that a site specific water quality impact study would not give a full picture of the implications of this project. There are at least two large bankers' boxes on file at MPCA about the ESAD with tons of data and reports about the site (we know because one of our committee members read the entire file about twenty years ago). Apparently this site has been a sleeper for a long time. Craig Biglow, Brownfield Program Manager for the MPCA would likely need time to familiarize themselves with the files.

Certainly MPCA, DNR and MWMO need to be involved, and possibly the MN Department of Health. There could be serious public health, environmental and liability concerns should this plan be implemented.

Thank you for your consideration.

Sincerely,

Hothyn Munay

Kathryn Murray
Executive Director

Cc: Tia Anderson, DSI - City of St. Paul

Ricardo X. Cervantes, DSI Director - City of St. Paul Mitra Nelson, Ward 4 City Council Representative

Doug Snyder, MWMO
Dan Kalmon, MWMO
Crague Biglow, MPCA
Jamie Wallersted, MPCA