

From: [Phillips, Abigail](#)
To: [Krzenski, Jesse W \(EOB\)](#)
Cc: [Torres, Angela](#); [Barajas, Lisa \(Met Council\)](#)
Subject: Public Comment: Hillview Business Park's EIS Variance
Date: Monday, September 14, 2026 2:30:50 PM
Attachments: [Outlook-Metropolit.png](#)

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Hi Jesse,

You, Lila and I spoke last week about Metropolitan Council's review of Hillview Business Park's application for an EIS Variance. I'm reaching out now to submit a public comment on this variance application (below) on behalf of Metropolitan Council staff.

Thank you,



Abigail (Abi) Phillips

Pronouns: she/her/hers

Senior Climate and Land Use Planner, Local Planning Assistance

Community Development | Metropolitan Council

390 Robert St, St. Paul, MN 55101

Phone: (651) 602-1085

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Metropolitan Council Staff recommend that the EQB should not grant an EIS variance for Hillview Business Park in Arden Hills at this time. The submitted EIS variance application does not provide enough information to understand the full impacts of demolishing the structures. While the EIS variance application addresses, to some degree, how demolition will affect surface water resources and natural habitat, and notes that Rice Creek Watershed District and DNR staff have been involved in these discussions, it does not address how demolition might mobilize contaminants in the soil. This is a significant concern, as soil contaminant mobilization could pose risks to groundwater resources and create other environmental hazards if demolition proceeds before a full EIS investigation is completed.

The EIS variance application also does not acknowledge that the site is located in the City of New Brighton's Drinking Water Supply Management Area, which has been designated by the Minnesota Department of Health and the city as moderately to highly vulnerable to contamination. Groundwater flowing beneath this site moves within 10

years or less to municipal wells and treatment infrastructure that supply around 23,000 people with drinking water. The application also does not acknowledge that the site overlies part of the Priority B Surface Water Drinking Water Supply Management Area for the Minneapolis and St. Paul drinking water supplies. The applicant should consider potential impacts on downstream water supplies from potential contamination that could result from construction activities at this site. Any work that could create or mobilize groundwater contamination in this area should include plans to monitor and mitigate risks to groundwater and public health.

The EIS variance application also contains a significant inconsistency with a prior study of the area. The applicant writes under subpart B. Anticipated Environmental Effects of Undertaking the Proposed Construction: "The Proposer does not anticipate any significant environmental effects from undertaking the proposed construction." This statement contradicts a finding in Stantec's 2024 Phase 1 Environmental Site Assessment, prepared as part of the project's Scoping EAW process: "It is probable that when the storage bunkers are demolished that soil that has historically been in contact with creosote impregnated retaining walls could be impacted by PAHs at concentrations of potential concern." (Scoping EAW, Appendix C, 7.3 Conclusions). This discrepancy should be corrected and addressed in the application before it is considered for approval. Given Stantec's Phase 1 findings, there is reasonable basis to conclude that demolishing these structures could have a detrimental environmental impact significant enough to warrant completion of a full EIS before this portion of the project moves forward. It is therefore recommended the variance be denied at this time.

Finally, the applicant should outline any potential visual, noise, air, and water impacts of the demolition activities referenced in the EIS Variance request to adjacent Rice Creek North Regional Trail corridor.

From: [Morgan Gabrielson](#)
To: [Krzenski, Jesse W \(EOB\)](#)
Subject: Public comment for Hillview Business Park EIS Variance
Date: Thursday, September 10, 2026 10:09:46 AM

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Hello,

I am a resident of the Shamrock Park neighborhood, directly across County Road I from the Hillview Business Park site. I am asking the EQB to deny the requested variance allowing demolition to proceed before the Environmental Impact Statement is complete.

My biggest concern is that demolition and site disturbance could undermine the very environmental review that is supposed to determine how this property can be developed safely. The site is immediately adjacent to Rice Creek and its watershed and provides habitat for significant wildlife, including a large osprey population and bald eagles. The EIS should establish what is there and what protections are needed before the site is altered.

I am also concerned about hazardous materials. The property has a history of contamination, and the proposed demolition includes partially buried structures and foundations. I don't feel comfortable assuming there will be no significant environmental impact before the EIS has actually evaluated it.

I understand the developer's concerns about trespassing and safety, but I don't think those concerns should automatically justify moving ahead of the environmental review. There are other ways to secure the property while that process is completed.

The neighborhood has also received very little clear information throughout this process, which makes it difficult for residents to understand what is actually being proposed and what risks we are being asked to accept.

Please deny the variance and allow the EIS process to be completed before demolition begins.

Thank you,

Morgan Gabrielson

Public comments for Maplewood Development Variance request for Hillview Business Park in TCAAP in Arden Hills

September 2026

I live in the Shamrock Park neighborhood off County Rd. I (Arona St. between Pascal and Asbury) across the county road from the proposed Hillview Industrial Business Park Development in TCAAP in Arden Hills. The Shamrock Park neighborhood is in Shoreview so we don't have an elected voice representing our concerns on the Arden Hills City Council. The closest Arden Hills resident is about a 7-minute drive to this proposed development, making us the most impacted residents. County Rd. I is the only access in and out of our neighborhood.

I am one of the neighbors actively informing and organizing our neighborhood of 565 plus homes. Many in our neighborhood are very concerned about this proposed development as well as demo and clean up variance request. We had over 100 people at a neighborhood meeting on July 15 hosted by the developer, 75 people at the Aug 17 Shoreview City Council meeting and another 60 people at the Arden Hills City Council meeting on Aug 24. We have an engaged and concerned neighborhood.

A variance is being requested to start demo and clean up on the existing buildings for public safety to reduce trespassing, vandalism and fires on the site. I strongly ask the Board to uphold the integrity of Minnesota's environmental review process due to the concerns outlined here and deny the variance request.

The toxins in the existing buildings on the Hillview development site and trespassing on the property have been an area of concerns for decades and many in the neighborhood have shared their concerns with the City of Arden Hills, Shoreview and Ramsey County Sheriff for years and no action has been taken by any of these agencies to meaningfully address the safety and nuisance concerns on the site. There has been poor site security, lack of warning signs and miscommunication about site access between the local agencies, Lake Johanna Fire and the County Sheriff's Office so public safety professionals weren't able to access the site in a timely manner or do any monitoring or proactive enforcement. Tragically, a fatal incident occurred over the 4th of July weekend. Since then, some of these access and local coordination issues have been resolved, now giving law enforcement the access needed for proactive monitoring and response as needed.

The concerns of trespassing, vandalism and fires can now continue to be prevented and monitored with local code and law enforcement and without bypassing the environmental review. These safety concerns can be addressed by requiring the developer to install no trespassing signage, security fencing, lighting, security cameras and active site monitoring. As the Responsible Governmental Unit (RGU), Arden Hills has the authority to enforce public safety and hazardous property ordinances—bypassing state environmental protections to achieve site security and law enforcement is not appropriate.

Under [**Minnesota Rules 4410.3100, Subpart 6\(B\)**](#), a variance cannot be granted to relieve an economic or safety hardship caused by a proposer's own action or inaction if that hardship was

reasonably foreseeable. The developer knowingly purchased a site with pre-existing structural concerns, have done nothing to address these safety concerns, so they cannot use a known, self-created risk as a legal shortcut around the environmental review.

An EIS studies the land and environment to protect water, wildlife, open space and neighboring homes. Demolishing buildings, running heavy machinery and moving soil right now alters the land before experts can accurately measure environmental impacts, runoff, etc. being proposed by this development.

This site is currently open space, close to Rice Creek and contains the following wildlife: one of the largest recolonization of ospreys with at least 9 active nests in the area, bald eagles, kestrels which are a declining species, the rare tiger beetle, the rare Henslow Sparrow and Blanding's turtles

Asbestos and cresol are on the site along with unverified underground bunkers with unknown contents. Approving demolition before the EIS is complete creates a major public health risk as it will disturb hazardous structures including ones where the hazards aren't fully known.

Under [Minnesota Rules 4410.3100, Subpart 6\(D\)](#), a variance cannot be granted if it would eliminate feasible and prudent alternatives or mitigation measures that would otherwise be evaluated in the EIS. Altering site topography and soil conditions prematurely destroys the baseline conditions needed to assess protection measures for Rice Creek, wildlife and the surrounding neighborhood.

Throughout this process, both the developer, Hillview Development, and Arden Hills have not provided clear, timely communication to the Shamrock Park neighborhood and their own Arden Hills residents. While the communications from the City of Arden Hills is improving, our public trust and safety concerns remain unaddressed. Many in the neighborhood are concerned about continued lack of communications and transparency if this variance were to be approved, now putting our families and homes at health risks before we have the answers from the EIS.

I strongly ask the Board to uphold the integrity of Minnesota's environmental review process due to the concerns shared and deny the variance request.

If the EQB approves the variance request and allows demolition of the existing buildings and the start of the environmental clean up before the EIS is complete, the neighborhood wants strict, enforceable safety conditions to protect neighboring residents and local natural resources:

- **Air sampling:** Mandatory air monitoring for airborne asbestos fibers, particulate matter, and cresol/chemical vapors during all excavation and demolition activities.
- **Dust suppression:** Dust-control requirements such as watering, covered transport trucks and regular debris clean up.
- **Erosion & runoff barriers:** Heavy-duty fencing, sediment traps and catch basin protection to prevent runoff from reaching Rice Creek or surrounding stormwater systems.

- **Groundwater protection:** Protocols to prevent toxic soil and materials from coming into contact with local water sources.
- **Working hours:** Demolition and hauling restricted to standard weekday business hours (e.g., 8:00 AM – 5:00 PM) to minimize noise and traffic impacts.
- **Neighborhood meeting:** A neighborhood meeting before the start of any site work or demolition activities as County Rd I is our only access in and out of the neighborhood. Meeting will have schedules/timeline, safety protocols, process, etc.
- **Direct mailings:** Advance written notice mailed directly to all residents in the Shamrock Park neighborhood (565+ homes) to alert of both the neighborhood meeting and information about any site work.
- **Project webpage:** Weekly updates to the Arden Hills project webpage containing schedules/timelines, safety protocols and updates.
- **Staff contact:** A contact person for neighbors to report safety, dust, or noise concerns within 24-hour response time.

Also, County Rd. I and the access roads to the Hillview site are currently being used to remove toxic waste/mud from the drugging of Round Lake in Arden Hills. The toxic waste/mud was supposed to be taken out on Highway 96 but due to utility work by Xcel Energy, County Rd. I is now the exit for this toxic waste. No one in our neighborhood was informed even though County Rd. I is our only access in and out of the neighborhood and our children walk along County Rd. I to get to school at Pinewood Elementary and Edgewood Middle Schools. We are worried about the amount of toxic waste being taking out with both the Hillview and Round Lake projects at the same time on the only road to get to our homes and continued lack of communications and transparency from local government agencies.

Thank you,

Alyssa Kruzel
Arona St., Shamrock Park Neighborhood
Shoreview, MN

From: [Amber Brookman](#)
To: [Krzenski, Jesse W \(EOB\)](#)
Subject: Public comment Hillview Business Park/Maplewood Development
Date: Sunday, September 13, 2026 6:05:27 PM

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I am a member of the Shamrock Park neighborhood closest to the proposed project and have serious concerns regarding Maplewood Development's request for a variance before a comprehensive environmental impact study can be conducted. This development is could lead to serious impacts on the local watershed, specifically the Rice Creek regional north corridor that runs right through the property.

Additionally, I'm worried about Maplewood Development wanting to plow through important and necessary timelines when this patch of land has repatriated into an extremely delicate ecosystem full of keystone species, some of which were believed to be functionally extinct in Minnesota but have been found thriving on this piece of land. This area, once a toxic waste pit has flourished despite the odds, with native species that deserve the time and care and respect of a thorough environmental study.

Lastly, this development is going to have devastating impacts to the already underdeveloped traffic infrastructure. Neighbors are not being informed in a timely manner, people will be deeply impacted by decisions that we werent even allowed in the room for. This project impacts the safety of pedestrians and animals in the area as well and I'm concerned by the lack of interagency communication on the developers part. Please allow the necessary process of a comprehensive study to be completed before allowing them to tear up the site.

Rhank uou for your time,
Amber Brookman

From: [mary.peterson](#)
To: [Krzenski, Jesse W \(EOB\)](#)
Subject: Maplewood Development
Date: Monday, August 31, 2026 8:06:09 AM

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I am a resident of Shoreview whose neighborhood will be impacted by the proposed Hillview development in Arden Hills .

I have many concerns about this project and the possibility of a variance allowing construction to begin before the EIS is complete.

There are significant environmental concerns about this project.

I am opposed to this variance

Prejudicing the Environmental Impact Statement (EIS)

- An EIS studies the land and environment in its current state to protect Rice Creek, the wildlife, open space and our neighboring homes. Demolishing buildings, running heavy machinery and moving soil right now alters the land before experts can accurately measure environmental impacts, runoff, etc.
 - In addition to being very close to Rice Creek, the area contains the following wildlife: largest recolonization of ospreys with at least 9 active nests in the area, bald eagles, kestrels which are a declining species, the rare tiger beetle and the rare Henslow Sparrow.
- Known toxins like asbestos and cresol are present on-site, alongside unverified underground bunkers with unknown contents. Approving demolition before the EIS is complete creates a major public health risk because it is completely unclear from the developer whether work will stay above ground or disturb hazardous subsurface structures.
- Under [Minnesota Rules 4410.3100, Subpart 6\(D\)](#), a variance cannot be granted if it would eliminate feasible and prudent alternatives or mitigation measures that would otherwise be evaluated in the EIS. Altering site topography and soil conditions prematurely destroys the baseline conditions needed to assess protection measures for Rice Creek, wildlife and the surrounding neighborhood.

Self-imposed hardship vs. local code and law enforcement

- Under [Minnesota Rules 4410.3100, Subpart 6\(B\)](#), a variance cannot be granted to relieve an economic or safety hardship caused by a proposer's own action or inaction if that hardship was reasonably foreseeable. The developer knowingly purchased a site with pre-existing structural hazards; have done nothing to address these safety concerns, so they cannot use a known, self-created risk as a legal shortcut around environmental review.
- Safety hazards which have been known about for decades call for local code and law enforcement, not a bypass of environmental laws. Tearing down buildings isn't the only way

to fix safety concerns.

- Unlawful gatherings on the property have been a long-standing issue, largely driven by poor site security, access issues and miscommunication between the City of Arden Hills and the Ramsey County Sheriff's Office. Tragically, these unresolved gaps culminated in a fatal incident over the 4th of July weekend. Since then, those access and coordination barriers have been resolved, now giving law enforcement the access needed for proactive, regular patrols—proving that site safety can be managed through active monitoring without bypassing environmental review.
- As the Responsible Governmental Unit (RGU), Arden Hills has always had the authority to enforce hazardous property ordinances—bypassing state environmental protections to achieve basic site security and law enforcement is unnecessary and inappropriate.
- Safety can be addressed immediately by requiring the developer to install high-security fencing, lighting, security cameras and active site monitoring. A property owner's delay in securing their own land shouldn't be an excuse to rush the review.

Lack of transparency & communication:

- Throughout this process, both the developer, Hillview Development, and Arden Hills—as the Responsible Governmental Unit (RGU)—have consistently failed to provide clear, timely communication to the Shamrock Park neighborhood and their own Arden Hills residents. Granting a variance under this pattern of poor communications transparency creates severe safety risks and undermines public trust and leaves critical community safety concerns unaddressed. Arden Hills must hold themselves and the developer to a higher standard of open communication and environmental review, rather than approving exceptions behind a wall of poor communications and lack of transparency. Public safety requires open communication, not shortcuts.

If the EQB approves the variance and allows demolition to move forward before the EIS is complete, the neighborhood wants strict, enforceable safety conditions to protect neighboring residents, public health, and local natural resources:

- **Continuous Air Sampling:** Mandatory real-time air monitoring at the property boundary for airborne asbestos fibers, particulate matter, and chemical vapors (cresol) during all excavation and demolition activities.
 - **Dust Suppression Standards:** Enforceable dust-control requirements (e.g., continuous water misting, covered transport trucks, and prompt street sweeping).
 - **Subsurface Protocol:** Clear, published procedures specifying that work must halt immediately if unknown underground structures or hazardous materials are uncovered.
 - **Erosion & Runoff Barriers:** Heavy-duty silt fencing, sediment traps, and catch basin protection to prevent runoff from reaching Rice Creek or surrounding storm systems.
 - **Groundwater Protection:** Protocols to prevent soil disturbance or excavation from coming into contact with local water tables or unverified subsurface vaults.
 - **Working hours:** Demolition and hauling restricted to standard weekday business hours (e.g., 8:00 AM – 5:00 PM) to minimize noise and traffic impacts.
-
- **Direct Mailings:** Advance written notice mailed directly to all residents in the Shamrock Park neighborhood (565+ homes) to the start of any site work or demolition activities as County Rd I is our only access in and out of the neighborhood.
 - **Public project webpage:** Enhanced communications including weekly updates to the Arden Hills project webpage containing schedules and timelines, plans, reports and safety

protocols.

- **Dedicated community contact:** A contact person for neighbors to report safety violations, dust, or noise concerns with guaranteed 24-hour response times.

Mary Peterson
Shoreview, MN

From: [Karen Langenfeld](#)
To: [Krzenski, Jesse W \(EOB\)](#)
Subject: TCAAP variance request
Date: Monday, September 14, 2026 12:40:08 PM

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To Jesse Krzenski and voters on variance request from Maplewood construction to conduct demolition with the Primer-tracer area prior to an environmental study. I am a resident of Shoreview in the Shamrock Park neighborhood. My property is directly across from the Primer-Tracer development area, just a couple of thousand feet from the proposed demolition. I have been living in Shoreview for 27 years and have a Ph.D. in Educational Psychology from the University of Minnesota.

Please deny the requested variance to demolish the buildings in the primary-tracer area. While our Shamrock community agrees that "something must be done" we are concerned that skipping an important environmental assessment is not answer.

There are additional environmental hazards that the developer has not disclosed.

Many more environmental hazards other than the ones listed on the variance request exist in this area, including lead from munitions testing and target practice over the years. I am concerned that dust from the debris will affect my health and those of my neighbors, and that pollutants may enter the water supply. For more details, please see the evidence provided by Ann Maslansky-Takahashi.

The debris from the demolition will also be a hazard

Maplewood construction has not committed to the safe disposal of the rubble from taking down the buildings. Anything small enough to fit into a pocket, or large enough to be used as a destructive tool is trading one problem for another set of problems.

The real issue is lack of security and oversight

The incidents of dangerous and unlawful behavior have increased dramatically since Maplewood Construction purchased the property. The buildings have been there for many decades, and have always attracted trespassers. With or without the old buildings, the area is a handy, adult-free zone where the cops don't show, alarms won't sound, and cameras won't take your picture.

The locks are broken? Ask how long it takes Maplewood Construction to notice the break-in and replace the locks or repair the fence. Ask why there are no cameras. Ask why the buildings aren't boarded up. Ask why hazardous materials warnings aren't posted. Ask why they don't have security on site. Ever.

Ask Arden Hills and Ramsey county whether they plan to address crime and enforce the law, or if they think that the problems will magically disappear in a cloud of toxic dust without them lifting a finger or spending a dime.

The buildings should be removed when the rest of the development takes place, with enough activity in the area to deter trespassers, and we know more about the potential effects on the environment.

If the decision is made to allow the demolition to proceed, ask for a detailed

description of how they will assure the safe disposal and testing of the debris and find out *what else* Arden Hills and Ramsey County willing to do to keep the area safe. I don't believe the demolition is necessary – but it certainly isn't **sufficient** to solve the problem. Decisions have consequences – please do not make this one hastily.

Sincerely,

Karen Langenfeld, Ph.D.

[REDACTED]

Shoreview MN 55126

[REDACTED]

From: [Mary Rempfer](#)
To: [Krzenski, Jesse W \(EOB\)](#)
Subject: Public Comment: Opposition to Variance Request by Maplewood Development, Inc.
Date: Monday, September 14, 2026 1:45:24 PM

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Dear Environmental Quality Board Members,

I am writing to voice my strong opposition to the variance request submitted by Maplewood Development, Inc. to begin demolition of structures at the former Primer Tracer site prior to the completion of the Environmental Impact Statement (EIS). As a resident of the Shamrock neighborhood living directly on County Road I in Shoreview, I have serious concerns regarding the environmental and health impacts this premature action could have on our community.

Environmental Concerns & Lack of Due Diligence The site carries a documented history of severe contamination linked to the former Twin Cities Army Ammunition Plant. Known hazardous materials detected in the area include:

- Trichloroethylene (TCE) and Tetrachloroethylene (PCE)
- Volatile Organic Compounds (VOCs)
- Heavy metals, including lead
- Asbestos and creosote

Commencing demolition before the EIS is fully completed poses a significant risk of disturbing these toxins and contaminating surrounding soil and groundwater. Granting a variance undermines the very purpose of the EIS process, which is designed to ensure thorough due diligence and protect local public health and ecosystems before physical site disturbance begins.

Site Security vs. Environmental Protection While I deeply sympathize with the tragic loss of life on the property last summer, rushing demolition under the guise of public safety is the wrong approach. The trespass issues and safety risks over the past twenty years stem from inadequate property management. As the property owner, Maplewood Development, Inc. should be held responsible for securing the site immediately through basic, standard measures:

- Installing secure perimeter fencing
- Adding adequate lighting and security cameras
- Posting clear "No Trespassing" signage
- Discussing and planning trespassing measures with the Ramsey County Sheriff Department

Pushing for immediate demolition appears to be driven by liability concerns from Ramsey County, Arden Hills, and Maplewood Development, Inc., rather than a grounded assessment

of environmental safety. Liability mitigation must not override the mandatory environmental review process.

Conclusion After sitting vacant for decades, this property must not be rushed through demolition without understanding the full environmental footprint. The potential exposure to toxic substances directly impacts key stakeholders, including the residents of the Shamrock neighborhood.

I respectfully request that the EQB **deny the variance** and require that all demolition efforts remain on hold until the comprehensive EIS is fully completed and reviewed.

Thank you for your time, consideration, and commitment to protecting our community's environment.

Sincerely,

Mary Rempfer

Resident of Shoreview, MN

From: [Charlie Hofer](#)
To: [Krzenski, Jesse W \(EOB\)](#)
Subject: Hillview Business Park Development Project
Date: Monday, September 14, 2026 9:38:08 PM

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Dear Mr. Krzenski,

My name is Diane Hofer and I live in the northwest corner of Shoreview, Minnesota, directly two blocks north of the famous piece of undeveloped land here in the Twin Cities, known as the property of the old Army Ammunition Plant. Ever since moving here 33 years ago, there has always been discussion on how to clean this property up from its toxins and develop it. Besides this land being used by the National Guard for training purposes, development projects have never really become a reality, after many ideas being proposed, including the building of a new Minnesota Vikings Stadium. In the meantime, our residential neighborhood has thrived and been built up as a hotspot for outdoor recreational trail hiking and canoeing on the Rice Creek, with an extremely active city park (Shamrock Park), and the future hopeful addition of cross-country ski trails. We have two local elementary schools on each end of the neighborhood. We are a neighborhood of hardworking citizens who believe strongly in investing and taking care of community and family. And we treasure our neighborhood and believe in investing into keeping it safe and healthy.

Early this summer, a few of the neighbors happen to stumble on to a possible development on the arsenal land of a "light industrial park". Very little information was available initially, but as these neighbors dug into further research, a great alarm went up. The neighborhood has united in expressing our concern over this development, as we have NO idea what exactly is being proposed to be built in our community. We are not being given information as to what exactly this development is or who is behind it. We do know that the builder is Maplewood Development, who expressed upfront that neighboring concerns are of no interest to them. Neighbors have expressed concerns to both the City of Arden Hills and the City of Shoreview. The only residents in this entire area being affected by this development will be our neighborhood, a residential area that sits on the north side of County Road I, directly east of the 35W freeway. After learning that there will be approximately 1200 employee parking lot spaces and possibly 100 trucks coming and going from this industrial site daily, we neighbors were shocked, as this will GREATLY IMPACT us, with traffic coming in and leaving all on the north end of the site, along County Road I. What will this do to our property value? We are already landlocked into this neighborhood, with County Road I being our ONLY way in and out. As you can imagine, traffic safety issues and noise pollution are heavy on our minds. Our neighborhood has been built over time with an emphasis on outdoor recreation, and we have our children coming and going from school along that county road throughout the year. It has been stated that this county road is not designed/built to handle traffic any heavier than what already exists.

One other MAJOR concern for our neighborhood is the demolition of the old buildings that still exist on that old property, buildings Maplewood Development is responsible for demolishing, if this industrial site project is approved. Land contamination is also worrisome to us, as this land will be dug up. What toxins will fill the air during all of this construction? The building project is currently pending, while a deeper than initially thought environmental safety review is conducted. Maplewood Development is requesting a variance from the Environmental Quality Board (EQB) rule that prohibits construction activities before the Environmental Impact Statement (EIS) is complete to begin demolition and cleanup of the existing buildings on the Hillview site. With the developers disregard for the local citizens/neighborhood, you can imagine that accountability on their part is concerning to us.

Because of the lack of information, transparency and disregard as to how this development will impact our neighborhood, we residents have serious concerns. As I stated,, this land and its structures are known to be associated with toxins... NO secret. I would question how this whole clean up process is going to affect the county open space, the Rice Creek Watershed and the Shoreview neighborhood. It would be appreciated amongst our concerned community that we be given an opportunity to review the clean up documents from Rice Creek Commons and we ask that the Hillview Development follow the same process.

Also, it would be appreciated if we the community were able to see a plan for th actual movement of the materials from the clean up. This neighborhood is where we live and call our home, and all aspects surrounding this proposed development will impact us... and not ideally.

Please know we ask for proper procedures to be considered, respected and followed, especially when taking into account the community that already exists here.

Thank you for time and consideration on this matter,
Diane Hofer

Re:Maplewood Development And Construction, Inc.

To Whom It May Concern,

Thank you for the opportunity to comment on Maplewood Development and Arden Hills as RGU for multiple projects and current Variance requests.

I am Ann M. Maslansky-Takahashi. I am a GIS Technician and have advance course work with GIS/LIS Consortium and also ESRI. I have past served on the NWA SOC Union Liaison for for NWA operations as well as Homeland Security liaison after 9/11. I have certified as an EMT-D as well as a “GO Team” response member and CISM trained. I also have graduate course work through Hamline University Mississippi River Institute. I also am District 1 Charter Commissioner and a 31 year resident in the Shamrock Neighborhood to the North of TCAAP and County Road I.

I would like to raise concerns regarding Comments on the requested Variance by Patrick J Lindmark from Taft Stettinius & Hollister LLP and Arden Hills Resolution NO.2026-038. Specifically, a denial of the variance is respectfully requested under criteria that is outlined in Minnesota Rules Part 4410.3100. [1,2].

Also, I am requesting a statutory stay due to the EIS being incomplete, inaccurate and failure to properly disclose critical elements of the development site. The RGU Arden Hills under Minnesota Rules 4410.2500 to disclose and acknowledge gaps.

1. Primer Tracer site is an island and not accessible as stated in the EIS.
 - a. the easement given to Maplewood Developement is not legal under Ramsey County Home Rule Charter
 - i. Ramsey County Board violated The Charter when in fact it did not include a “no net-loss” prior to granting the sub easement which also may be in question.

Ramsey County Home Rule Introduction/ overview

“Pursuant to Section

2.02 K of the Charter, the County Board has the power to sell, lease or otherwise dispose of park property upon

such terms as it considers best in the public interest. This Section allows for transfer of park property by shifting

the decision-making process from the state legislature to the county board and requires at least two public

hearings. If the county board decides to proceed with the transfer, it must be done by ordinance.

In 1994, the electorate approved an amendment to this section of the Charter stating that the County Board

shall adopt, by resolution, a policy requiring no net loss of park, recreational or open space land and facilities

before it can convert county park or open space to other uses.”

The exact governing text is found under **Section 2.02 (K)** of the [Ramsey County Home Rule Charter](#). The 1994 voter-approved "no net loss" amendment added the following specific legal directive to the County Board's powers: [1]

“...the County Board shall adopt, by resolution, a policy requiring no net loss of park, recreational or open space land and facilities before it can convert county park or open space to other uses.” [1]

2. Arden Hills, Ramsey County, Shoreview and the Metropolitan Council have written agreements that the easement access parcel that this is designated Park, open space and wildlife corridor.
 - a. proposal and agreement includes acquisition of the Primer Tracer site to preserve the intended usage of the Rice Creek Regional Trail

- b. Ramsey County waste advised of the proposed boundary adjustments and associated 2,407.24 acre (including the Primer Tracer site) was to be submitted to the Metropolitan Council system request. This was affirmed in the 2024 Regional Parks policy.
- c. Ramsey County and Arden Hills as RGU failed to send preliminary plans to the Environmental Services Assistant Manager at the Metropolitan Council **PRIOR to initiating any new development of the regional trail corridor.**

Reference 2040 Regional Parks Policy Plan.

Metropolitan Council Business Item 2021-1 January 7, 2021

- 3. No EIS or any studies have been done on Parcel C (chimney looking parcel that gives only access for the Primer Tracer site connected to County I) that is clearly mapped as Park and is designated as such.

This was referenced in a presentation by Ramsey County Park and Recreation to the Ramsey County Charter Commission in 2022

Improper Project Prejudgement makes assumptions not based in fact. Again the Primer Tracer EIS Scoping document is incomplete and violates Minnesota Rules 4410.2500

Maplewood Developer stated this will be a 1 million acre site with 100-200 heavy trucks and 1,200 employee parking spots. This was stated at multiple public meetings and to concerned residents.

- 1. This fact alone indicated Arden Hills as RGU is violating its own city code as such a large capacity Development is not considered "light industrial, office, and warehouse/distribution complex."
 - a. In fact there is no zoning in Arden Hills that aligns with this designation. In Chapter 13(zoning code) of the City Code of Ordinances, there are I-1 Limited Industrial District, the I-2 General Industrial District, and the I-Flex District.

The above shows that a stay of this project and denial of the variance due to gross misrepresentation of the project.

The sheer size would nullify the Rice Creel Regional Trail Corridor and its planned usage. It would also Eliminate Alternative mitigation and intended usage.

Maplewood Development and Arden Hills as RGU have failed to show extreme hardship.

Arden Hills and now Maplewood Development has a long and extensive documented history of Environmental hazards.

See Aug 6th letter from Taft Stettinius & Hollister LLP

The 'public safety' issues have been ongoing for decades at the site. The GSA and historical TCAPP documents have been documented. When the property was sold Maplewood Development did not continue to maintain the fence or locks on the site. Nor did the work on requested mitigation to fix fences or locks. In fact Ramsey County Sheriff's department requested remote surveillance and to date this has not been undertaken.

I myself personally have called in incursions and specifically requested Ramsey County Sheriffs increased surveillance. Including prior to 4th of July as there is historically incursions on the site. Unfortunately this year it resulted in a death. This death was exacerbated by the fact Lake Johanna Fire Department was never notified (as well as possible Ramsey County Sheriff's Department) by Arden Hills as the RGU or Maplewood Development that this was now "private" party. The rescue of the now deceased party was delayed because needed equipment had to be requested as no plans were set forth for this highly complex location. The Ramsey County Sheriff Department is now acting as a private security agency at taxpayers expense. These Deputies were surprised to find out it is hazardous/contaminated and under the National Guard and TCAAP considered a "no go" area due contamination and possible unexploded ordinances.... In fact the military never even drove let alone drove in the Primer Tracer area. In fact some of the heavy equipment training is done on County Road I and PT testing and

training is done at Shamrock Park, with the 1 mile course being perimeter roads/trail around Shamrock Park due to the TCAAP environmental issues

Arden Hills as RGU and Maplewood Development has willfully not included the most affected residents in this process. Both on the ongoing hazards, planning and development.

Shoreview requested all residents to the North of this development be notified. In fact I personal. Have caught Arden Hills not sending out open meeting required notices (this is why we have a roundabout as Arden Hills as RDU for Rice Creek Commons did not know our children **walk to Pinewood Elementary along County Road I and ride bikes through this corridor to Edgewood Middle School**). The very route 100-200 trucks a day will exit onto County Road I as well as all the remediation and construction equipment. This is also where all the contaminated materials will have to traverse. Not to mention environmental exposure in this process with both the remediation and the 1 million square feet of a heavy industrial warehouse or transfer operation. Imagine the road that Fort Snelling State Park has with this type of proposed development and 100-200 trucks sharing the road in a park, recreational wildlife corridor and only one way onto the highway. Currently I cannot even exit off County I going North as the traffic is a parking lot after about 2:30-3:00pm necessitating exiting onto County H from 35W north then using Thumb Road/Old 8 now Rice Creek Boulevard to connect via the roundabout at County Road I. A month ago a traffic enforcement was performed by Ramsey County Sheriff's department and in 1 week 300 stops and 90+ citations were given in this short corridor. This didn't even touch on the Speed and road issues of County Road I north of the Arsenal.

Arden Hills as RGU and Maplewood Development have also minimized the contaminants as "only some asbestos and creosote timber. When in fact the RAB (Restoration Advisory Board) meetings and documents clearly indicate that the residences to the North of the TCAAP site are the most at risk for Vapor Intrusions not limited to the following: 1,4 dioxane; TCE (trichloroethylene); ethylene dichloride; 1,2 dichloroethane VOC's as well as impact water quality for shallow water, drinking water for Arden Hills and New Brighton(and other communities), run off into both the aquifer, Rice Creek

that flows in to Long Lake (that is still currently deficient) which also flows into to the Mississippi Water Shed.

Shifts in the past from site A with no construction caused shifts in the contaminated ground water plume necessitated e additional mitigation wells (via virtual meeting RAB20210420190217)

Also, with the Rice Creek Commons tenant Micron Controls the neighborhood to the North experienced power loss, power surges and brown out notices(on days that temps were below 80 degrees). At least 5 transformers were ultimately replaced. Arden Hills as RDU for Rice Creek Commons again is deficient in accounting for the needs of the residences to the North of TCAAP/County Road I. Even the SGRS (Source Ground Water Recovery System) was impacted as this is actively handling in ongoing hazard mitigation on the TCAAP sites.

Already a home on the corner of Shutta and County Road I whose property tax value in 2026 was \$367,000 and is currently listed for \$334,000 with no potential buyers due to Maplewood Development and Arden Hill as RGU (in multiple RGU) as well as National Guard/Army projects that are using the Park parcel (parcel C) with no EIS/EAW/Scoping/environmental considerations.

Minnesota Environmental Quality Board (EQB) denies a construction or procedural variance from environmental review rules if the request fails to meet the specific criteria outlined in [Minnesota Rules Part 4410.3100](#). [1, 2]

In summary, this variance in my opinion needs to be denied. But also in fact Stayed for all the above reasons.

Sincerely,

Ann M. Maslansky-Takahashi

, Shoreview MN 55126

Dear Mr. Krzenski and Members of the Environmental Quality Board,

I am writing to express my strong opposition to the pre-demolition variance requested by Maplewood Development, Inc. for the Hillview Business Park project in Arden Hills. The applicant is seeking to bypass Minnesota Rules to begin demolishing abandoned structures on this **62-acre Superfund site** before a comprehensive Environmental Impact Statement (EIS) is finished

As a resident of the Shamrock Park neighborhood, I urge the EQB to deny this variance. The request fails to meet the strict legal thresholds required under state rules, presents severe public health risks to nearby residents, and contains glaring discrepancies regarding subterranean demolition.

1. Failure to Meet Legal Thresholds for a Variance (Minnesota Rules 4410.3100)

The developer is attempting to use a public safety issue as a corporate development shortcut to bypass state environmental law. This request must be denied based on two clear components of Minnesota Rules:

- **Foreseeable, Self-Imposed Hardship (Subpart 6B):** Under Minnesota Rules 4410.3100, Subpart 6B, a variance cannot legally be granted to relieve a hardship caused by a proposer's own action or inaction if that hardship was reasonably foreseeable. Maplewood Development knowingly purchased a property with pre-existing structural hazards and assumed that risk as a condition of their investment. Their failure to properly secure the site cannot now be used as a legal backdoor to escape environmental review. Public safety goals can—and should—be achieved immediately through standard municipal code enforcement, high-security fencing, and property lockdowns, rather than bypassing state law.
- **Elimination of Alternative Mitigation Options (Subpart 6D):** Under Subpart 6D, a variance cannot eliminate alternative options from the EIS. Demolishing and filling structures drastically alters the baseline site topography and soil conditions before the EIS can measure them. This destroys the ability of the EIS to study alternative mitigation measures required to protect **Rice Creek** and our surrounding neighborhood.

2. Discrepancies in Subgrade Work and Documented Vapor Intrusion Risks

There is a direct discrepancy between the developer's public narrative and the explicit text of their variance application. In Arden Hills City Council meetings, this request was framed as a safety measure to knock down visible, above-ground structures to deter trespassing.

However, the scope of the developer's requested variance specifically extends to including any partially buried bunkers and any below ground foundations.

Altering underground infrastructure before the EIS establishes environmental boundaries directly intersects with documented subsurface contamination data tracked by the Twin Cities Army Ammunition Plant (TCAAP) Virtual Restoration Advisory Board (RAB):

Active Shifting Plume: There is an active, migrating shallow groundwater plume at Site A presenting a Vapor Intrusion (VI) risk to the residential neighborhood directly north of the property boundary.

The 12.3-acre Site A parcel sits immediately adjacent to the northern boundary of the Primer Tracer property. Because temporary data proved the groundwater plume moved outside its historical footprint, the U.S. Army finalized delineation data and installed permanent groundwater monitoring wells at Site A.

As you may know, vapor intrusion occurs when volatile organic compounds (VOCs) migrate from contaminated soil or groundwater through the vadose zone and accumulate inside indoor air spaces via openings and foundation cracks. The specific contaminants of concern tracked at this site are Trichloroethylene (TCE) and 1,2-Dichloroethane (ethylene dichloride).

3. Demands for Accountability, Communication, and Public Health Protection

Our community refuses to be the next Minnesota public health disaster. We have watched the devastating, multi-generational impacts of chemical mismanagement with 3M and Water Gremlin. We demand absolute transparency regarding who is safeguarding our air and water, how often it is being checked, and how that information reaches us.

Before any physical disruptions are permitted on this site, the following standards must be codified:

- **Testing Authority & Frequency:** The public requires independent verification regarding which agency—whether the Minnesota Pollution Control Agency (MPCA), the Minnesota Department of Health (MDH), or the U.S. Army—is legally responsible for testing these permanent wells. Furthermore, given the actively migrating front of this TCE plume, testing must occur on a strict, multi-season schedule (including peak winter heating months and non-heating months) to catch vapor spikes before they reach our basements.
- **Direct Community Communication:** Environmental data must not be buried in dense, hard-to-access government registries. We demand a proactive, localized communication plan, including public-facing online dashboards, mailings to

Shamrock Park residents, and regular, transparent public forums whenever new well data is finalized.

- **Prioritizing Human Health:** The health and safety of nearby families must take absolute priority over a private developer's timeline. If well data shows any elevation in VOC migration or vapor intrusion risks, there must be a legally binding mechanism to halt all site activities immediately.

5. Formal Questions for the Record

Before the EQB can legally grant a variance that compromises the site's footprint, the public demands clear answers to the following questions:

1. Which regulatory entity will be solely responsible for executing the ongoing testing of the permanent Site A wells, how frequently will they be sampled, and where will that data be published for the public?
2. How will the EQB guarantee that filling "subgrade structures" will not alter the local hydrology, shift subsurface pressure, or open new migration pathways for the plume toward residential neighborhoods?
3. How will the EQB ensure that heavy demolition equipment and subgrade filling will not disturb, damage, or block access to the permanent Site A groundwater monitoring wells?
4. How will the EQB guarantee that filling these subgrade formations will not trap volatile vapor pockets or permanently bury contaminated soil before the full EIS is published?

Conclusion

Local taxpayers should not be stripped of our right to a complete environmental review before heavy industrial demolition begins on a toxic site. I urge the EQB to protect residential air quality, defend public health, and maintain the legal integrity of the environmental review process by denying this variance.

Sincerely,

Katie Christensen

[REDACTED], Shoreview MN 55126

[REDACTED]

[REDACTED]

From: [S. Sentieri](#)
To: [Krzenski, Jesse W \(EOB\)](#)
Subject: Hillview Comments
Date: Thursday, September 10, 2026 9:01:47 AM

You don't often get email from [REDACTED]. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

I've done a little research since attending the council meeting.

1. 1 million square feet, sounds like a data center
2. Ramsey County's No Net Loss contingent should stop this
3. If the City Council has truly signed NDA agreements, the whole constituency should be frightened, not just us.