

Proposed Tiller/Zavoral Gravel Mine in Scandia Minnesota.

Comments on the Adequacy of the Final Environmental Impact Statement

by the St. Croix River Association

The responses made to the comments previously received on the EIS are disappointing. They read as if the EIS contractor, AECOM, solicited responses from the permit applicant Tiller, and published them without much independent analysis. Thus Tiller no doubt finds the EIS acceptable. But those of us concerned with the environmental impact of the proposed mining, find much lacking in the document. As it now stands, it does not adequately analyze the environmental impacts that would result from the proposed mining project.

First, consider the 9 acres of woods not previously mined, that Tiller wants to remove so that it can get at the gravel underneath. The only analysis made of the obvious negative effect of that on the environment, is an acceptance of Tiller's assertion that they need the gravel underlying the woods, and Tiller's implication that if they cannot mine there, the whole project becomes economically infeasible for them. No supporting data is provided for that assertion. Nor is any support provided for the EIS's claim that the loss of that 9 acres of woods does not constitute a material adverse impact on natural resources.

Second, there is no response at all to the comment that the hole left after the mining would be essentially unusable. There is an explanation of how many houses could be built in it, but no explanation of how anyone would want to build in a hole that deep. The comment was that the hole would be 60 feet deep. The response was, see the diagrams provided, but those diagrams are not readily decipherable. The responses do not deny that the hole could be that deep. There is no response at all to the comment that the site as it sits now, is far more amenable to development than it would be after the proposed mining.

Third, the EIS avoids a serious discussion of the no-build alternative. About all that is said is that Tiller needs the gravel. But Tiller has shown that it does not have such a need, by agreeing to not mine its Franconia pit while it is extracting 1.2 million tons of gravel from the Zavoral site. All the project does is extend the life of the Franconia pit ten or more years in the future. There is no data provided on demand for gravel that far into the future.

Fourth, the responses to the comments on noise ducked the issue entirely, by taking the defensive posture that the noise won't violate any state noise standard. But that proves nothing, because the state does not have any noise standards for rivers such as the St. Croix which are national parks. The Park Services standards for such settings must be applied, and have not been by the EIS.

Fifth, the FEIS does not adequately respond to the concerns expressed about truck traffic and safety, especially at the intersection of STH 95 and 97. The traffic analysis completed by a consultant for the Take Action-Conserve Our Scandia was basically ignored.

Sixth, the document is inadequate in its response to the concerns about the property value analysis. We feel the loss of property value will be more severe and cover a wider area than the FEIS claims. Finally, the EIS is unable to bring itself to confront the overarching issue raised by the proposed project, which is why it should be tolerable to operate a gravel mine impinging on a national park. The attitude of the EIS is, the park user won't even know the mine is there and it poses no risk to the park's resources. Which just is not so.

For these reasons, the St. Croix River Association asks the Scandia City Council to hold that the Environmental Impact Statement does not adequately deal with the issues raised by the proposed Tiller/Zavoral gravel mining project.

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