

10 September, 2012

City of Scandia, Responsible Government Unit for the Tiller Zavoral Mine Project  
Re: Final Environmental Impact Statement

To Whom It May Concern: City Council, City of Scandia

We write as a citizens of Scandia, and property owners of our home and farm that is within 1 mile of the proposed mine.

At this date, four + years into a lengthy study, the Final Environmental Impact Statement should be complete and more than adequate—adequate enough to allow a responsible government body to project the potential environmental impacts of the Tiller Zavoral mine. Complete enough so that any question one might have is answered. One should expect that comments and concerns expressed by citizens and interested organizations be adequately developed in response, after many delays and postures from Tiller and its representatives. Both direct and indirect cumulative impacts should also be included, as the Environmental Quality Board Guidelines require. If, indeed, the DEIS is lacking in comprehensive, and quantified analyses, and excluding both direct and indirect cumulative analysis, then one should expect that the City's attorney would prepare the Council in its decision-making role to challenge the DEIS.

I hope that the Council will make astute and incisive challenges to the DEIS, taking seriously its role as the RGU on behalf of all those who will be impacted by this proposed mine. YOUR job, as I see it, is not to succor Tiller, but to be the smartest and most aggressive defenders of Scandia and her residents. If the DEIS is allowed to move forward without serious challenge from the RGU, then one can conclude bias, or lack of concern.

**There are many areas of concern—**

**The No Build Alternative as a serious component of the Statement:**

Zavoral was late in offering his future plans for the site. Now he says that he plans to develop the site for housing. The DEIS should look at this proposal from the vantage of the site post-mining, as well as from the position/question "HOW" development would benefit from the site AS IT IS today. Which scenario is environmentally less impactful to the trout streams and seeps? To the St Croix National Scenic River? To local roads, and to traffic? To bikers and pedestrians? To air quality and noise levels? To the quality of life for neighbors and even for distant residents who will be impacted by traffic, changes in property values, and effects to the city at large...from the perspective of Scandia's 2030 Comprehensive Plan and vision. The PAC rep from the Met Council made astute comments about the future use of the site after mining. The DEIS is far short of flushing out the potential advantages of a No Build decision.

**Traffic analysis and planning (as a function of cumulative impacts):**

We live off of 95 just north of the site. Recently, after waiting for some time to leave our intersection at 220<sup>th</sup> St North onto 95 traveling south, I experienced a gravel truck loaded and driving above the speed limit. He was initially far to the north and

behind me, but caught up to my car riding my bumper to the intersection of 95/97. He used his jake break all the way, and to avoid hitting me at the intersection (he was going too fast, too close) he pulled into the southbound lane, jack-knifing his cab as he came to a stop. I filed a police report with Washington County, and with Deputy Majesky. • Driving north on 95, at any time of day, passed the Zavoral site is nothing short of scary. Traffic turning north from 97 onto 95 cannot judge well the distance of cars coming from the south. I cannot imagine the stress and potential tragedies when gravel trucks entering and leaving the Zavoral site are added to this intersection. The DOT is irresponsible to give the impression that their analysis is complete. It is not

If there are 2 areas of concern that should be addressed, these are they.

**The indirect consequences of this mine proposal, in any scale, are not palpably projected in the DEIS:**

The soft impacts, the indirect impacts of this mine in any circumstance, will so affect life on the River, a National Park and treasure... it's frankly heart breaking that any RGU official would not take this responsibility seriously. We are stewards of Scandia's environment, and of the St Croix River for all 300 million of its owners. The DEIS barely considers this. The city of Scandia will have no authority to enforce these inevitable impacts, they will fall outside Scandia's jurisdiction. This, among the many outcomes, should stop each Council member in his/her tracks.

Our request to the City of Scandia, its attorney, and all consultants to Tiller's proposal, is to not sit back now, but to use its authority as RGU to defend what will be a true and comprehensive EIS. It's not that now.

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