

COMMENTS BY THE ST. CROIX RIVER ASSOCIATION ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED ZAVORAL GRAVEL MINE

These comments on the draft EIS augment those delivered orally by the St. Croix River Association at the Scandia public meeting on April 3, 2012.

As we stated at the public meeting, the draft EIS fails to reflect the condition of the pit that would be left after the proposed mining would be completed. Paragraph 1.1.1 asserts the average depth of mining will be fifteen feet, ranging from 10 feet to 70 feet. But figure 10 flatly contradicts that assertion. It shows excavation to a base pit floor elevation of 840 feet. It does not show a similar figure for the pit as it is now, but it shows excavation depths which are typically way more than fifteen feet. At the northwest corner of the pit, it shows 50 feet of excavation, and the same in the west central part of the pit. In the now-wooded area, it shows excavation to below 40 feet. The depth of the pit that Tiller wants to create, must be made evident in the final EIS. It will be a major hole. As it is, figure 10 shows that the bottom of 840 feet is 60 to 80 feet below the west edge, and 35 feet below the southwest edge.

The Scandia city council will be using the final EIS as a critical information source when it considers the conditional use permit application. We want it to understand that the proposed end product will be distinctly worse than what is there now. The bottom will be so far down that five story houses would not extend beyond its top, and trees planted would not reach the top for decades.

Regarding tree planting, figure 23 shows the now-wooded area will, post-restoration, be dry prairie and mesic prairie. It will not be reforested. In neither figure 23, nor anywhere in the EIS, is the extent of proposed tree planting revealed.

Regarding erosion control, it must be pointed out that at Tiller Corporation's sand mine near Grantsburg, an erosion control berm failed recently and sediment-laden water entered a wetland then a small stream and eventually flowed into the St. Croix River. If Tiller cannot properly control erosion on the relatively flat landscape near Grantsburg, how can it be expected to properly control erosion on the steep slopes adjacent to the Zavoral site?

The draft EIS lacks analysis of the usefulness of the pit for residential development, by comparing its present attractiveness for residential development, against the likelihood of people wanting to live in the bottom of the crater-like setting that the proposed mining would create.

Otherwise, the St. Croix River Association stands by what it said at the public meeting. where we urged particular attention be paid to the comments of specialists representing TA-COS and the National Park Service. Allowing a gravel operation right up against this National Park would be most unfortunate, a serious mistake. Many millions of public dollars have been spent on this park for land and scenic easements; this is not a project warranting devaluing that investment.

There was talk at the public meeting that the Final EIS might include the city's preferred alternative. It should not. The EIS is an information document, not a decision

document. The decision should be reserved for argument at the conditional use permit hearing.

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Board members, for the St. Croix River Association