

May 16, 2012

Anne Hurlburt, City Administrator
City of Scandia
14747 209th St. N.
Scandia, MN. 55073



Dear; Mayor Simonson,
Council person Sally Swanson
Council person Chris Ness
Councilperson Connie Amos
Council person Jim Snyder

The mission of Take Action- Conserve Our Scandia is: To promote sustainable development in Scandia while endorsing conservation of its waters, wildlife, natural and historic resources and beauty, while referring to the Scandia Comprehensive Plan as our visionary guide.

I fully support the letter and all of the comments made on behalf of Take Action- Conserve Our Scandia submitted by Kieran Dwyer of Dorsey Whitney. In addition I am making the following comments:

Additional Comments to City on the DEIS for the Tiller Mining and Reclamation Proposal

Incomplete contents of the DEIS

Since the EIS is intended to analyze “potential for significant environmental impacts”, there needs to be an analysis of chemical use on groundwater, seeps and streams.

Tiller intends to use calcium chloride within the mine area for dust abatement. According to a report on the Health of Streams in the metropolitan area by the Metropolitan Council in 2010, the amount of chloride in streams going into the St. Croix River had increased from 2000 to 2010. For both the Minnesota and St. Croix streams, the chronic chloride standard was exceeded 10 times during 2010. The chloride used in the mine will quickly infiltrate the soil and end up in streams and contaminate shallow groundwater. We know that chloride is toxic to trout (documented in Zavoral Creek) and hazardous to growth including pine trees and poplars. See Potential Impacts of Dust Suppressants: Avoiding Another Times Beach EPA Expert Panel Summary, May 30-31 2002 Section 3 and 3.1.1, 3.1.2&3.2.2

Also, in the EPA document noted above, Section 3.2.4 “dust suppressants have little efficacy at suppressing small respirable dust (particulate) have the potential to be inhaled directly into the lung and cause lung disease.” To say it will not meet the standard for causing cancer is quite dismissive of people’s health concerns. Of the fine small particulate, 25% is silica.

The EPA information above needs to be included to fully analyze the potential negative environmental impact of the mine.

Tiller plans to use herbicides during the reclamation and re-establishment of groundcover. Since Tiller will be mining down to 3 feet above the water table, herbicides will quickly infiltrate the groundwater and potential health problems may result. Why is this impact not included?

As one of two reasons to mine this area, Tiller has claimed that the site will be “more stable and less subject to soil erosion” after the site has been reclaimed. Where is the documentation that the site is unstable and subject to soil erosion now? Which area? During and after the mining process the site will be more unstable and subject to erosion, certainly while clearing, grubbing and removing overburden and while establishing new plants communities. If there are drought periods, it may be difficult or impossible to establish new growth. We also know from meteorologists that our storms are becoming more intense, localized and less predictable. Furthermore, the area will be more susceptible to erosion after losing an additional 23 plus acres of well-established trees.

Where is the analysis of the negative impacts of noise and dust as a result of removing over 23 acres of established trees mostly 30 to 80 years old? Noise will not be blocked and dust will not be trapped.

The EIS should include one alternative under the Alternative Designs or Layouts item. Given that the community has expressed ongoing issues with mining an additional 8 or 9 acres in the previously un-mined area next to the site, there needs to be an inclusion of a design that does not include mining the additional 8 or 9 acres. The Comprehensive Plan approved in March of 2009 and the Development Code approved thereafter, specifically intended that no new areas be opened to mining. Loss of the 5.4 acres of mature trees will increase noise, decrease habitat suitability for red-shouldered hawks. (Red shouldered hawks need large stands of mature old trees for breeding.) Medium quality is average quality and is a value to this area. Even though they were not found during the surveys they have been frequently observed in the closely surrounding area. The additional 9 acres is the most susceptible to erosion under any conditions. The DEIS stated that it will be more stable after reclamation which will be a considerable amount time from the commencement of the project. Since this area has not been mined before and has a steep gradient flowing down to South Creek the likelihood of an accident or extreme weather event resulting in serious erosion is great and irreversible. *(Despite Tiller’s well-intended plans and implementation of the Grantsburg frac sand mine near highway 70, at the end of April, 2012 one of their berms failed. This resulted in sediment spilling into the wetland below and the St. Croix River.*

I do not think that the information in the DEIS adequately addresses the potential negative environmental impacts to this area and the surrounding area. Every area lost, impacts the whole ecology of the area.

The Scoping Document states that the economic impact, including impacts to the economy and tourism must be quantified. What is the data and analysis used to quantify these issues and conclude that there will be little impact? Also the aggregate tax owed to the County and Scandia needs to be clarified in the Economic section of the DEIS.

According to Item # 9- Land Use- the DEIS must address each of the alternatives on the current and future land use that will be impacted by the project.

Where is the data and analysis to support that the reclaimed area will be more suitable for residential development, agricultural use or conservancy? The outcome of the mine will be: a deeper and bigger hole (as close as 3 feet above the water table), the need to build special sewer and septic systems for any future development and few or no trees in most of the area compared to the 23 acres of existing established trees. The outcome of mining will not be more suitable for development, agriculture or conservancy. What will this “gateway to Scandia” be suitable for???

How did we get from “mining an additional 15 feet” “ including approximately 8 acres of un-mined area(Scoping Document)” to mining up to 70 feet and an additional 9 un-mined acres that contain 50% of the aggregate extracted from the area (DEIS)? Even at the third PAC meeting, Leslie Knapp affirmed that Tiller would be digging a hole 15 feet deep on 63 acres. (See meeting notes) I think this is one of the issues that has been misleading to the public. The aggregate in the additional 9 acres may be desirable to Tiller but there is no documentation that the need for this aggregate is essential within the Scoping Document or the DEIS.

Despite some additional information in the DEIS, the No Build Alternative sections do not adequately identify all the benefits of the No Build Alternative including:

- *Not removing over 23 acres of established trees (over 35% of the existing site).
- *Not easily viewing a noticeable gravel mining operation and a very contrived set of land forms when driving toward the site from highway 97 or passing by on Scenic Byway 95.
- *Not negatively impacting the trout in Zavoral Creek with calcium chloride.
- *Not potentially contaminating the groundwater with herbicides.
- *Not adversely impacting the health of the people in the surrounding community and riverway due to small particulate such as silica. According to the DEIS, 25 percent of the aggregate extracted will be silica. There is significant documentation that there is no effective suppressant for silica dust and that it does cause lung disease.
- *Not increasing the difficulty of developing the area for homes with few trees and expensive sewer and septic systems.
- *Not greatly increasing the likelihood of traffic accidents by increasing the number of conflicts from 2 conflicts to 6 conflicts)
- *Not risking unanticipated environmental consequences that can be very costly to undo or the negative impact to environmentally sensitive areas that can be impossible to restore. (This includes the land surrounding the Zavoral mine and the St. Croix Riverway.)
- *Not negatively impacting the reasons people from all over the country value and enjoy the experience of the St. Croix Riverway.
- *Not hindering or complicating future land use options.
- *Not risking the safety of people driving through the 95/97 intersection with gravel trucks crossing the road every 4 to 8 minutes.
- *Not risking loss of business for Scandia or Marine as a result of numerous gravel trucks driving up 95 through Marine to the mine and west on 97 through Scandia.
- *Not continuing the mining of frac sand (50 feet below the surface) along the St. Croix River.

The Cumulative Impact is incomplete

This section must include reports by Dr. Scott Alexander, Applied Ecological Services Inc. and Vern Schwing of RLK and Associates, Lisa Philippi's market analysis of property value reduction, my additional information and all additional data and analysis given to the city.

The DEIS discussion does not include indirect impacts. If the city reviews this information, it will be clear that the cumulative impact is collectively significant and has the potential for significant environmental impact.

The only reasonable alternative for the City and the 99.9+ % of the citizens is clearly the NO Build Alternative!

If another alternative is chosen by the City Council, the mitigations must include:

Not mining the 9 additional acres to avoid the loss of over 5 acres of old mature trees and habitat and risking erosion and damage to the south creek area.

No use of calcium chloride or any hazardous chemicals for dust abatement to avoid toxins to trout, trees and other growth and groundwater contamination.

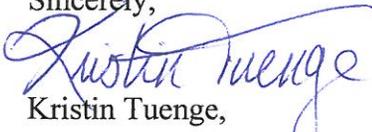
No use herbicides that may be toxic to humans and animals.

There must be ongoing monitoring of Zavoral Creek and South Creek seeps for water level, temperature, chlorine and sediment due to reports by Scott Alexander, AES and EPA Chlorine information. This expense must be paid by Tiller.

Adding an acceleration lane on 97 if the mining is approved for more than 150 days to make this area safer and more usable for other motorists. There was ample evidence in April of 2012 that gravel trucks were involved in accidents, safety violations and safety threats to citizens.

I appreciate the opportunity to give input into this critically significant issue and hope my comments and those of Take Action- Conserve Our Scandia are taken seriously.

Sincerely,



Kristin Tuenge,
20595 Quinnell Avenue N,
Scandia, MN. 55073

“We abuse land because we regard it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect.”

Aldo Leopold