

## Anne Hurlburt

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**From:** Johnson, Ron [rjohnson@Hazelden.org]  
**Sent:** Friday, May 18, 2012 2:36 PM  
**To:** 'a.hurlburt@ci.scandia.mn.us'  
**Subject:** Comments on Draft EIS for Zavoral Project

Dear Anne Hurlburt,

At the last minute (nearly), here are my comments on the Draft EIS for the Zavoral Project.

My name is Ron Johnson. I am a resident of Farmington Township in Wisconsin. I live right across the river from the Zavoral property.

I have reviewed the Draft EIS for the Zavoral Property Mining Project to the best of my ability. Here are some comments and questions that I have:

The EIS says that Tiller will not haul Class C add-rock from Osceola or Franconia to the Scandia mine during the years the proposed Zavoral mine is active. As a result, it says that the number of daily trips on Hwy 97 will not increase from current levels, and that the number of daily trips on Hwy 243 and Hwy 95 from Osceola/Franconia to the Scandia mine will essentially drop to zero. But won't the Osceola and Franconia mines still remain active? And couldn't gravel from them be transported directly to construction sites or to facilities other than Scandia? If that happened, the number of daily trips on Hwy 243 and Hwy 95 might not be reduced at all, or at least not to the extent that is claimed.

The EIS says that a north-bound right turn lane will be added to Hwy 95 at the Zavoral mine entrance. If the gravel from the Zavoral mine is to be transported directly to the Scandia mine via Hwy 97, then why the need for the north-bound right turn lane? Does Tiller also plan to send gravel to the south (on Hwy 95) as well as to the west (on Hwy 97)? Will trucks be coming from the south and then hauling their loads back to the south?

The EIS says that the use of the material from the Zavoral Site, as opposed to the more distant sources (Osceola and Franconia) currently used, will reduce environmental impacts related to hauling, such as the use of fossil fuels and air impacts. What they neglect to say is that as soon as mining operations are completed at Zavoral, the add-rock hauling from the more distant sites will resume, along with all the problems associated with it. It seems dishonest to use this "distance" argument as justification for reopening the Zavoral mine.

The EIS says that there may be a perceptible increase in noise levels at a number of residences as a result of mining operations at the Zavoral Site. Right now, neighbors of the Zavoral Site are subjected to the noise from trucks hauling add-rock from Franconia/Osceola to the Scandia mine. When the Zavoral mine is reopened, there will be additional noise from dozer, excavator, compactor, scraper, chipper, skidder, grader, and skid steer loader operations, as well as noise from water trucks, off-road trucks, and of course haul trucks. These noises will occur during site preparation, mining operations, and the reclamation phase. There may be times when site prep, actual mining, and reclamation activities will be going on simultaneously. Judging from the amount of activity that will be occurring and all the equipment involved, it seems to me that the EIS is really underestimating the potential increase in noise levels.

Back when the Zavoral mine was in operation in the 1970's and 80's, I remember that one of the most irritating sounds coming from the mine was the constant "beep-beep" of back up warning alarms on trucks and other equipment. I cannot find any reference to this type of noise in the EIS. Is there any way to mitigate this type of noise pollution?

The EIS says that berms will be used to screen mining activities and reduce visual impacts of the mine. But berms themselves are not attractive land features (a quick tour of the Tiller mine sites along the Hwy 95 in Franconia is proof of this). The EIS says that the berms may be removed as part of the reclamation. If the berms are near the highway, then I think they should definitely be removed as part of the reclamation.

The EIS says that the Zavoral Project would meet two primary needs: 1) Provide local aggregate material to surrounding communities; and 2) Reclamation at the end of mining operations would improve the character of the site. This raises some questions for me: Aren't there already enough gravel mines in the St Croix Valley, and especially along Hwy 95? Doesn't an awful lot of the gravel mined here end up going to places far from the St Croix Valley? Aren't the residents of this area already paying a high "price" in terms of increased noise, increased traffic, wear and tear on our roads, and degradation of the scenic qualities of our beautiful river valley, all resulting from the current mining activity? And how can removing hundreds of mature trees, removing 1.2 million tons of gravel, and then covering the hole with a few inches of topsoil, some prairie grasses and pine trees improve the character of the site?

It feels to me like the EIS minimizes every impact that the mine will have.

Thanks for taking the time to read this. I thank the Scandia City Council and Planning Commission for all the work that they have done during this long process.

Respectfully,

Ron Johnson  
2878A 50<sup>th</sup> Ave  
Osceola, WI 54020