21509 Lofton Ave N
Scandia, MN 55073
May 17, 2012

To the Scandia City Council:

Thank you for the opportunity to comment on the Zavoral Draft EIS. As residents and business owners in this community we have very strong feelings about this proposed project. After looking through the draft and attending various meetings for the project, it is not apparent to us that this could go forward under any of the proposed plans, other than the no-build option, without adversely affecting the delicate balance of the St. Croix Riverway, the quality of life of those living along the proposed haul route, or the health of locally owned businesses (such as ours) that rely on clean and green growing conditions.

As outlined below, several areas of the draft EIS are lacking in detail or substance, or are missing altogether. The most basic question, however, has not, to our knowledge, been either asked or answered: How does this project benefit the citizens of Scandia? Certainly clean up of the pit is desirable, but further excavation and mining has extreme costs and no return for anyone other than Dr. Zavoral and his business. In fact, allowing his business to move forward with this proposal will at the very least undermine the profitability of our business, and could do so much as destroy it all together. Most egregious is that any of the options to proceed would destroy the quality of life for our household while seriously compromising our business and making it difficult for us to sell our property and relocate.

Specifically, here are some important questions we have after reviewing the Draft EIS:

1. The most important issue to the community in general is that of the fragile environment of the Riverway. Others have commented on this in great detail and with more expertise than we can offer but we would like to add our concerns that nothing in the Draft EIS comes close to reassuring us that damaging mistakes will not be made again as they have in the past.

2. The use of Calcium Chloride as a dust suppressant is poorly addressed. What is the impact of using CaCl on this sensitive environment? Although essential to plant health, many plants are able to tolerate only small concentrations of this mineral. Since most metal chlorides are very water soluble, excess chloride ions are prone to transport essential cations such as sodium, potassium, and magnesium to nearby lakes or streams leaving the soil deficient in those elements and likely causing an imbalance in areas downstream.

3. We did not find discussion on regulations for the efficiencies of load covers or a plan for mitigating the buildup of aggregate on roadside berms. Buildup of debris on berms is a safety hazard for bicyclists and pedestrians. The current truck traffic creates varying levels of debris on the side of the road, enough so that it interferes with cycling, walking, or running. In the case of our household, this already limits the use of the road outside our home, and if traffic increases, it would be reasonable to expect debris to increase accordingly. Additional gravel on the roadside could be expected to eliminate our use of the road for fitness or recreation. How would this hazard be avoided, how would it be

monitored, and how would we be compensated for loss of use resulting from failure to prevent it?

4. Road surface damage is not adequately addressed. The current level of truck traffic has left Lofton with a damaged road surface and minimally repaired cracks, breaks, and scattered roadside debris. It would be reasonable to expect that increased truck traffic of any number would increase the damage to the road. It does not appear that the tax revenue from this proposed project would come close to pay for road maintenance, repairs, and berm cleanup.

   In addition to the effect on general road traffic, damage to Lofton results in increased water drainage to our property and increased damage to our driveways. How will this be mitigated and monitored, and how will we be compensated for damage to our property and driveways if it is not prevented?

5. Real estate values as described in the Draft EIS are inadequate and misleading. A portion of our property has been offered for sale for the past decade. We have had inquiries regarding the property but no sale. Those who have explained their lack (or loss) of interest have given as reasons for looking elsewhere: the location of the pit across from us (Scandia Pit) and the truck traffic currently hauling to and from that pit.

   From this empirical data, we can reasonably expect that increased truck traffic would increase the level of disinterest and lower the value of our property from the standpoint of sale-ability. Where in the Draft EIS was consultation with property owners near either pit or along the transport route reported? It appears that research never happened, even though it would be a reasonable course of action in the evaluation of the impact of this project on real estate sales.

6. The reclaimed pit site…a pit fifty-plus foot deep, reclaimed with grass and trees? What research was done to conclude that this is an acceptable outcome? It is certainly at odds with the results of community surveys over the past decade that detail the community's preferences and expectations.

7. Fragile species survey timing was restricted and inadequate. The Draft EIS discusses a biological survey of fragile species on the Zavoral pit site. The survey was attempted during June to look for adult plants, but for some species such as American Ginseng, which had been found on the Zavoral property in the past, the best time during the year to look for immature plants is in the fall. It is entirely possible that American Ginseng, and perhaps other fragile species is on the property but was not found due to a highly restricted survey period.

8. The survey of noise from current traffic included in the Draft EIS is inadequate. Noise generation from truck traffic is multidimensional and far more complex than described in this draft. In the Draft EIS, only a simple survey of decibel readings was included at a site where traffic was flowing near an open field, and even then noise levels were at a maximum allowed. Nothing was included in the report that reflected the noise of trucks slowing or accelerating after a turn or a stop sign, or coming up or down a hillside, or passing an area where sound would be reflected from a hillside along one side of a road to a residence and business on the other.

Our property includes all of these variables, any one of which increases truck noise. When these factors are combined, the perceived noise levels in our home and business is often too loud to hold a conversation at arms length with a customer or a family member. Some days this disruption occurs for a few minutes, and other days it spans several hours. The current traffic levels are too loud, too often. Any proposal that increases truck traffic will increase this disruption and would be unacceptable. If the proposed hauling takes place, how would this noise be abated and monitored, and how would we and our business be compensated for failure to prevent it?

Low Frequency (LF) noise generation was not addressed anywhere in the Draft EIS that we could locate. No plan was found to estimate LF noise, prevent it, or compensate for it. LF noise triggers stress responses in plants, adversely affecting growth and resistance to pests and disease. This is an obvious problem for crops growing along the haul route. LF noise also adversely affects animals including humans but in particular those who are elderly, suffer from PTSD or migraines, or from neurological disorders such as Parkinson's or Lyme Disease. These are mentioned in particular because all of these health issues are found in our household. Not only would our family members be adversely affected by LF noise, but our business growing plants would suffer as well. Extrapolating from existing truck traffic, it would be reasonable to expect the magnitude, timing, and incidence of LF noise generation from increased truck traffic from any of the proposed plans (other than the no-build option) would be tortuous. If any of the proposed hauling takes place, how would Low Frequency vibration be limited and monitored, and how would our household and our business be compensated for failure to do so?

9. Adverse effects on air quality along the haul route due to dust and contaminants from the number of trucks proposed was not addressed in any manner that we could determine from the draft. Again, our personal health and green business is highly sensitive to environmental stressors and we find nothing in the draft that assures us that we will not be physically and economically damaged by the proposed project.

In conclusion, we find the Draft EIS to be lengthy, yet lacking. We are concerned about the health of the St. Croix Riverway as well as that of our household and business. The Draft EIS raises many questions, and for us fails to address how this proposal will benefit us in any way. In fact, it reinforces our belief that this proposal will destroy our peace, torture our health, destroy our business, and leave us in a position where we are unable to sell our property and move.

Scandia residents have said that they want Scandia to be rural, with positive rural values. We fail to see how any part of this proposed project is rural in any positive sense of the word.

Sincerely,

Donald and Marilyn Hogle, Gary Hogle, Jan Hogle
Twin Pine Farm