

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

4/6/12



Re: Zavoral/Tiller Mine Operation

Ms Hurlburt,
We are Larry and Mary Whitaker. We reside at 625 Pine Cone Trail,
Marine on St. Croix.

Common Sense and Credibility:

The current Scandia Comprehensive Development Plan does not allow mining on that site. Why is this mining operation even being considered? There are many other site options available.

Tiller has taken years to collect data and analysis for this EIS. They have missed deadline after deadline. Their original permit application should be canceled due to failure to meet requirements. Tiller never did complete the required reclamation for their 1980's mining operation. Their lack of commitment to meet their obligations should not be rewarded.

We have listed here the top 3 of our concerns about the inadequacies of the DEIS concerning the scope document for the Zavoral / Tiller mining effort. Traffic Safety; The integrity of the St. Croix River; Valley Environment.

Safety

Our family members and we frequently travel Highways 97 and 95. We think that this DEIS has not adequately studied the traffic patterns and traffic safety issues.

With 300 to 700 truck trips crossing highway 95 each day, there are numerous traffic safety issues that have not been addressed. This point was noted with the 6-point vs 2-point accident scenario as stated at the 4/3/12 meeting with traffic crossing vs right turning.

Why would Scandia allow these potential safety issues in our community? If you approve this project we urge Scandia City Council to include in the permit the requirement to have a 3 way stop or a traffic circle at the intersection of Hwy 97 & 95, and to also add an acceleration lane onto west bound highway 97 and north bound Hwy95.

Given the slow acceleration of loaded gravel trucks and the number of trucks crossing highway 95 during a "haul event", how many minutes each day will highway 95 be blocked due to truck crossings? This will be a very dangerous situation for hwy 95 traffic, without adequate traffic control.

Integrity of the St. Croix River

This mine site is located in a very unique location that is adjacent to a National Treasure, namely the St. Croix River. Therefore special precautions must be taken to prevent any damage to this unique natural resource.

In case of a "flash flood" event, will Dr. Zavoral, Tiller Corp. and the City of Scandia be required to rectify any resultant damage to private and public lands and property, as well as the St. Croix River?

The existing reclamation plan is way too vague. There should be specific details identified and illustrated. Consider the following:

Water run off and ponding issues. How will contaminated water be controlled and kept out of the St. Croix River?

Tiller must provide Vertical cliff wall terracing and/or retaining walls to prevent side wall cave-ins and erosion. They should also be held liable for the long term maintenance of these items.

How many trees, and of what species will be replanted? Where will they be placed?

How many species of native grasses will be replanted, over how large of an area?

Have the WCD, or DNR Land Management Specialist approve the reclamation plan.

Valley Environment

How will air, noise and water pollution monitoring be conducted at the mining site and along the haul routs, during the mining activity? Who will be conducting the testing and who will be doing the evaluations? (AECOM has not been as thorough as we feel is required.) Who will do the enforcement? Will the enforcer have the authority to stop the operations when limits are exceeded? Will Tiller be required to immediately stop operations when any limit is exceeded?

What plan has been made to mitigate the back up alarm noise on equipment so it is not heard by people canoeing or kayaking on the river?

Business

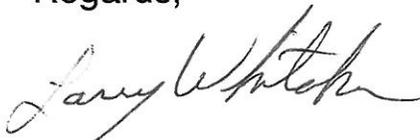
Has there been a study of how local area businesses will be affected by this mining operation, given the large number of trucks traveling highways 97 and 95? Have these businesses been consulted?

Most of the merchants in Marine rely on the traffic volume passing on Hwy 95 to be profitable. How many loaded, and empty trucks will be passing through Marine on St. Croix each day on their way to and from the work site? At what time of day will they be passing through? Have the Marine City Council and local business owners been informed of this increased traffic volume?

In closing:

There are many unanswered questions yet to be answered. How can a valid cost / benefit analysis be completed without all the detail identified. Will the additional tax income offset the actual costs to the community? Is this worth it?

Regards,



Larry Whitaker



Mary Whitaker

Cc: TA-COS