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From: Bill Clapp [bill.clapp@me.com]
Sent: Thursday, December 01, 2011 3:17 PM
To: Scandia Township
Cc: Randy Ferrin; Kristin Tuenge; Deb Ryun
Subject: Comments on Zavoral mining project preliminary draft EIS

These Comments on the preliminary draft EIS for the Zavoral mining project are from Bill Clapp, PAC member, speaking also for the St. Croix River Association board. These comments are confined to a few main issues, without implying that issues not addressed here will not be raised later.

Regarding ES 2.1, current land use. The second paragraph's term "1-mile area" is unclear.

Certainly if one draws a one mile radius around the mine, the parks and open space figure quoted of 12% is clearly wrong. Almost all the land east of the mine is part of the St. Croix National Scenic Riverway, which is part of the country's national park system. Somewhere in the EIS it should be noted that the impetus for requiring an EIS, arose from the proposed mine's extremely sensitive location, abutting not only a national park, but also a state scenic byway.

Regarding 2.1, need for the project. Tiller's need for the material which would be mined, is belied by their intent to stop mining at their Franconia site while mining at Zavoral's; ergo, they don't need this additional material at this time. As to reclamation, such work is not dependent on mining. It is reasonable to suppose that a twenty house residential development could provide the financial wherewithal to reclaim the site. Also, it is easier to reclaim the present hole, than to reclaim the much deeper hole that would be the outcome of the proposed project.

Regarding 4.1.1, affected environment. This section should recognize that immediately to the east of the site is a national park, and to the west is a state scene byway.

Regarding 4.16.1.2, noise impact analysis. It is of no use to refer to the state's noise standards, because there are none for this sort of park setting. What is necessary for the EIS is a comparison of the noise that would be imposed on the receptor sites, with the existing noise levels. These base line levels should be what are shown in Table 35, in place of the MN Standard numbers now listed. Noise being perhaps the most harmful impact of the proposed project, the preliminary draft EIS is not ready for acceptance until we understand what the change in noise levels will be, particularly those in the national park.

Regarding Alternatives analysis. (1) Mining in that part of the area which has not been mined before, certainly can be dropped from the project. This is a nice wooded area. What material does not come from there, can come from the Franconia mine. If this area is mined, then it should be made the last phase of the project. (2) As to the no-build alternative, Tiller can continue to take gravel from their Franconia site. Further, as previously noted, mining the site is not prerequisite to restoring the site. And mining as proposed turns a 15 foot deep hole into a 40 foot deep hole. Restoration will not lessen its depth. Would a developer want to gamble on selling homesites in such a setting? (3) Tiller has acknowledged that they could remove all the material they intend to

take, in a half a year. Add another year for restoration, and a two year alternative time frame becomes attractive. If mining has to happen, why not minimize the time extent of the pain?

Thank you for considering these points

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