

## Anne Hurlburt

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**From:** Doperalski, Melissa (DNR) [Melissa.Doperalski@state.mn.us]  
**Sent:** Monday, December 05, 2011 8:27 AM  
**To:** a.hurlburt@ci.scandia.mn.us  
**Subject:** RE: Re: Preliminary Draft EIS - Zavoral Mining and Reclamation Project

### Additional comments/suggestions:

It would be helpful to include a table for comparison on the proposed project and alternatives. The table could include relevant impacts that could occur, for example, if there will be impacts to TH/End species and then describe what those might be for that alternative action.

The DNR has numerous data shapefiles available that may helpful in depicting features on figures. Some of these layers would include Minnesota County Biological Survey Sites of Biodiversity, Native Plant Communities, and Regionally Significant Ecological Areas to name a few. This information can be found on the following webpage <http://deli.dnr.state.mn.us/>.

Thank you,  
Melissa

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**From:** Doperalski, Melissa (DNR)  
**Sent:** Thursday, December 01, 2011 4:38 PM  
**To:** 'a.hurlburt@ci.scandia.mn.us'  
**Subject:** Re: Preliminary Draft EIS - Zavoral Mining and Reclamation Project

Please see below for DNR comments to the preliminary Draft EIS for the Zavoral Mining and Reclamation Project as requested as part of the Project Advisory Committee. The DNR will be continue to participate in the environmental review process during the public comment period. The comments/suggestions stated below are not to be interpreted as final comments or to be inclusive of all DNR comments/concerns/suggestions for the proposed project.

The DNR appreciates the opportunity to have participated in the PAC for the proposed project.

Please note that some comments below are strictly suggestive as they pertain to the structure of the document. I hope that these comments are helpful.

I look forward to reviewing the complete document in the near future. Please do not hesitate to contact me if you have questions.

Thank you,  
Melissa

### General comments:

Suggestion: The Executive Summary is lengthy and confusing as it includes detailed information that would seem more appropriately discussed within the applicable Sections.

### Comments:

A discussion should be included in the document that details the environmental process to date. Some information is already included in the Abstract; however, it would provide valuable information to discuss the scoping document etc in the EIS. In addition, the revised scoping post-EIS decision (regarding previously proposed activities and the current proposed activities) should be included (I believe this was mentioned in ES 2.7).

Fourth paragraph, page ES-1, clarification of the last sentence regarding reclamation activities is suggested (e.g. will occur in phases etc.).

Page ES-3 as well as in PAC meetings has mentioned that the Cities Development Code states that mining is not an allowed use in AG-C Zoning District.

Preliminary Draft EIS, page ES-11, the DNR previously commented on the terminology used to describe the cliff type on and adjacent to the project area. Maderate cliffs are confined to the blufflands, occurring only in karst topography where ice is trapped beneath the rocks creating unusually cool conditions in the summer. The cliffs are more accurately typed as a southern mesic cliff. This comment applies to relevant Sections throughout the document.

Executive Summary comments listed above can be applied to Sections as well please.

Page 2-2, Table 3, Incorrectly identifies the DNR PAC member as Gerald Johnson.

Section 4.0, Subsection 4.1, as mentioned during the PAC, information should include area features such as parks, state and federally-designated recreational areas etc. Corresponding figures should include depict these areas as well.

As referred to in PAC discussions, the DNR completed a site survey of Zavoral Creek in September 2010. I have included a DRAFT summary of the findings that may be useful – please share this with Mike C. Please note that this is a DRAFT summary of the findings. Brook trout and burbot were found within the creek. Based on the findings and in conjunction with other surveys completed in the area, the DNR is considering pursuing a trout stream designation for Zavoral's Creek.

Subsection 4.6.3 regarding Blanding's turtles. Although Blanding's turtles were not observed in the project area during the survey, the potential for their occurrence exists. The Natural Heritage letter included two attachments for Blanding's turtles, a flyer and fact sheet, that details avoidance measures and information individuals working on the site should be aware of. I have included these two attachments to this email as well. These should be included, along with an updated NHIS letter (as mentioned during the PAC), within the EIS. In addition, the DNR asks that the specific measures that the proposer intends to adopt from these forms be identified and discussed in the mitigation section of the EIS.

Section 4.8.2 – the DNR encourages limited use of the well as this will not only limit the stressors on the Mt. Simon Aquifer, but will also reduce the amount of potential runoff leaving the site (surface and groundwater).

Section 4.10 – the DNR encourages wildlife-friendly erosion control matting when needed. Several mesh materials used for this purpose are detrimental and/or fatal to many types of wildlife.

**Figures:** - in general it is helpful to identify water features on figures

- Figure 2 should show more of the area features (related to comment above).
- Figures 4-8 – would be helpful of the descriptor titles on the Figures stated more specifically what the Figure depicted "...Phase 1...". In addition, since the Figure depicts elevations, it would be helpful to depict the elevations of the proposed berms as well.
- Figure 9 was not included in the Preliminary Draft EIS.
- Figure 10, referring to a comment made during the last PAC, there is a "green – Parks & Open Space" area depicted east of the project boundary. Please identify what this feature is in the Land Use discussion Section.
- Figures 15 and 17, Legend – Maderate Cliff. Related to comment above, maderate cliffs occur only in karst topography where ice is trapped beneath rocks. The cliff is more accurately typed as a Southern Mesic Cliff.
- Figures 15 and 19 depict similar information.
- Figure 28 is indiscernible.

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