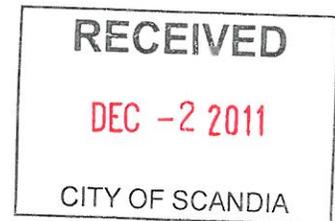


November 30, 2011

Anne Hurlburt, Administrator
City of Scandia
14727 209th Street North
Scandia, MN 55073



RE: City of Scandia Preliminary Draft Environmental Impact Statement (DEIS)
Zavoral Property Mining and Reclamation
Metropolitan Council District 12 (Harry Melander)
Project Advisory Committee Review Comments

Dear Anne,

Metropolitan Council staff received the City's preliminary DEIS for the Zavoral Property Mining and Reclamation project on November 9, 2011. The proposed project involves mining and site restoration of 64 acres of the 114-acre site located east of State Trunk Highway (TH) 95 near its intersection with TH 97 in the City. The following comments are offered on the preliminary draft document.

4.3.1.3 Review of Reclamation Plan

Should the City decide to allow site mining and reclamation to proceed, very little soil and organic matter will be left on the site following reclamation to provide for filtering of nutrients and contaminants to prevent them from infiltrating to the groundwater on the site. Ordinarily, we rely on the surficial organic-rich soil horizons and naturally developed clay-rich soil horizons near the surface to filter out and retain surface-deposited contaminants, fertilizers, and pesticides as moisture moves them down from the surface toward the ground water table. Post-mining and reclamation, only approximately four inches of variable-component topsoil material and three feet of coarse sands will remain above the water table on most of the site, which will be in constant movement laterally to the east. The groundwater below the mine site will only be moving laterally a short distance over a very short relative time span (potentially days to weeks) before it reemerges on the eastern bluff slope as groundwater seeps that will accumulate in the small streams and run off the site area. We recommend that *no* fertilizers or pesticides be allowed to be applied to the site following mining and reclamation (aside from very short lifespan chemicals spot-applied to control noxious weed growth during reclamation), to minimize the potential for contamination of and toxicity impacts to the downstream seeps and streams which flow to the Saint Croix River. Active farm cropping and residential development of the site following reclamation are discouraged.

4.5.1.1.1 Plant Communities

The forested area below the bluff line within the southern perimeter of the site's proposed mining area, which has not been previously mined, is included within the MnDNR's designated Regionally Significant Ecological Area (RSEA) and within the *Metropolitan Council 2030 Regional Development Framework's* designated Natural Resources Inventory and Assessment (NRI/A) area within the twin cities area. The 6 to 8-acre area is part of a larger adjacent area which has been characterized as 'outstanding' in quality by the NRI/A. The white pine-hardwood forested area within the proposed mining area appears to be part of the larger high-quality wooded area which trends along the Saint Croix River bluffs along the eastern boundary of the site. The Council's policy with regard to areas mapped within either the RSEA or the NRI/A is to encourage their protection and conservation by local land use planning authorities. Therefore, Council staff recommends that the mining area limits be redefined to avoid and protect these regionally significant natural resources.

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4.15.2 Potential (Dust) Mitigation Measures

The document proposes the application of calcium chloride to the internal haul roads from the edge of the milled portion of the haul road through the unpaved haul roads within any given active mining phase. Council staff cautions against the use of any calcium chloride within the mine site, due to the coarse texture of on-site road base materials, the near complete internal drainage of the site both during and following mining, its potential for long range negative impacts to plant growth, and the high probability of resultant elevated chloride concentrations in the downgradient groundwater seeps and streams due to their close proximity to the on-site application areas. "Application of chemical dust suppressants should be avoided near sensitive environments, near water bodies and fractured rock, in areas with a shallow groundwater table, and other areas where water could quickly reach the saturated zone." (*Potential Environmental Impacts of Dust Suppressants "Avoiding Another Times Beach"*, An expert panel summary, Las Vegas, Nevada, May 2002, <http://www.epa.gov/esd/cmb/pdf/dust.pdf>)

However, should the decision be made to *allow* the limited use of calcium chloride on the site during mining, chloride concentration monitoring should be added to the list of parameters requiring mandatory surface water quality monitoring in the surface flows of seeps and streams on the eastern bluff face. After first establishing what existing chloride levels are, an acceptable maximum level should be established before mining begins (that will not negatively impact known macroinvertebrates or fish in the streams) and require ceasing further use of calcium chloride should that maximum value be reached or surpassed.

The Metropolitan Council will take no formal action on the preliminary DEIS. If you have any questions or need further information on these comments, please contact me at 651-602-1159.

Sincerely,



Jim Larsen, P.E.
Environmental Engineer/Senior Planner
Regional Systems Planning and Growth Strategy

Cc: Harry Melander, Metropolitan Council District 12
Lisa Barajas, Sector Representative
Cheryl Olsen, Reviews Coordinator