

## **Comment before February 6 on the Yoder and Dabelstein frac sand mines – tell Winona County we need an EIS.**

**Environmental review of the Dabelstein and Yoder mines has been seriously flawed from the start.** Environmental Assessment Worksheets (EAWs) on these mines were first published in October. After LSP members and staff called attention to many major errors in both the EAW process and the content, Winona County withdrew the documents to be re-done. New EAWs were published on December 24, Christmas Eve. Starting the comment period in the middle of the holidays put citizens at a serious disadvantage, but even worse, key information (the Operation and Reclamation Plans for each mine) was not made available. To correct this omission, the EAWs were re-published again on January 7, and **the comment period now runs until February 6.** This pattern of errors is the consequence we can expect when the frac sand industry pressures local governments to rush through the environmental review process. While some previous inaccuracies have been corrected, a major problem remains – these two mines are clearly part of a single project, and should actually be considered together in a single environmental review.

If you did submit comments in the fall, you will want to do so again, as these new EAWs are significantly different from the old versions. **Your comments are an extremely important part of the process.** The county is required to respond to all substantive comments received. These responses become part of the findings provided to the County Board before it makes the decision on whether to require an Environmental Impact Statement (EIS). An EAW is only a first step to determine whether a much more in-depth, comprehensive EIS is needed. State law requires that an EIS be ordered if the EAW process shows that a project has the “potential for significant environmental effects.” The EIS is important because it fully analyzes both economic and environmental impacts and explores ways to mitigate these harms. The EAW does not do this.

You can view the EAWs here: <http://www.co.winona.mn.us/page/3038> on Winona County’s website, or in hard copies at the LSP office, Winona Public Library, or St. Charles City Hall.

### ***In your comments, raise any of the following major concerns:***

**The Dabelstein and Yoder mines would destroy over 120 acres of natural land and farmland in central Saratoga Township.** The Yoder mine is now proposed to be 84.3 acres (almost 50 acres larger than before), while the Dabelstein mine would be 36.5 acres. The two sites are located less than a mile from each other, a few miles southeast of St. Charles and southwest of Utica.

**The scope of the EAWs is incorrect.** These two mines are clearly part of the same project, and should have been reviewed together in a single environmental review. The same company, Minnesota Sand, would operate both sites, at the same time, less than a mile apart. The mining company even claims that operations would be coordinated between the two sites, for the extensive truck traffic, for example. Minnesota Sand, not just the landowners who are currently listed, should actually be listed as the “proposer” on the EAWs. The proposed Minnesota Proppant frac sand plant near St. Charles is also part of the same project and should be reviewed together with the mines. Why is this not being done? The proposers want a piecemeal environmental review process to hide the full damaging impacts of the complete project on our water, air, land, roads, and quality of life.

**The two mines would generate 1,200 truck trips per day, six days per week.** Despite Minnesota Sand’s claims about coordinating truck traffic, each EAW states that each mine would generate 600

truck trips (300 loaded trucks) per day. Sand would be hauled on County Roads 6 and 29, I-90, and Highway 43 into the city of Winona. A loaded frac sand truck weighs 40 tons. The impacts of these hundreds of trucks on local citizens' safety, road infrastructure, and air quality, have not been adequately studied and must be examined further in an EIS.

**These mines would create a huge risk for sinkhole formation and groundwater pollution.** Both mines are located in an area well known for karst conditions. Part of the Dabelstein site is already known to have a moderate to high sinkhole risk, and the excavation of sand would increase the likelihood of sinkhole formation, which would allow surface pollution to enter directly into our groundwater.

**The EAWs gloss over the amount of water these mines would use.** The EAWs state that water will be used for dust control on mining equipment, sand stockpiles, and haul roads. They claim that this water will be brought in by tanker trucks, but give no specifics on how many tanker trucks, how often, where the water will actually come from, and how much will actually be used. We need an EIS to study the mines' full impacts on our water resources.

**The dust produced by these mines would include extremely dangerous crystalline silica, known to cause silicosis, lung cancer, and other diseases.** The frac sand boom has begun so quickly that the danger of crystalline silica exposure to neighbors of sand mines has never been adequately studied. These health risks must be considered further in an EIS.

**The cumulative effects of the Dabelstein mine, Yoder mine, and the many other frac sand proposals in the immediate area must be studied in depth.** The Yoder and Dabelstein mines are two of seven proposed frac sand mines within a few miles of each other in Saratoga Township and neighboring Pilot Mound Township, Fillmore County. The Minnesota Proppant sand processing and transport facility, which would be the largest frac sand plant in North America, would be located a few miles north. The combined impacts of all of these proposals, in addition to the individual impacts of the Dabelstein and Yoder mines, are not adequately addressed in the EAWs and must be studied comprehensively in an EIS.

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### **Contact Information for EAW Comments**

Planning Director Jason Gilman must receive all comments, but we recommend that you also send them directly to the County Commissioners, who will ultimately decide whether to order an EIS.

**Winona County  
Commissioners**

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**Planning Director**

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## **Guide for Submitting Comments on the Environmental Assessment Worksheets (EAWs) for the Dabelstein and Yoder Frac Sand Mines**

- The public comment period will end on Wednesday, February 6.
- Submit separate comments for each mine, even if the concerns you mention are the same or similar in both. The comments can be mailed to the county together, or sent via email.
- Specifically state in your comments that “the project has the potential for significant environmental effects and an Environmental Impact Statement should be required.” By law, if the EAW process shows there is the “potential for significant environmental effects,” then an in-depth Environmental Impact Statement (EIS) is required.
- Include your name and address so that the county can respond to your comments. The county is obligated to answer all comments that bring up specific environmental concerns.
- Planning Director Jason Gilman must receive all comments. Also, send your comments to the Winona County Commissioners. The county commissioners are the ones who will ultimately decide if there is a more in-depth Environmental Impact Statement.
- Submit individual comments. Even if you and a group of friends or neighbors share many of the same concerns, you should each send in your own comments. This demonstrates that a large number of people are concerned and want an Environmental Impact Statement on the projects.
- Be specific. Do not simply state opposition to the project or ask questions. Mention particular issues contained in the EAW and make statements about what you think the environmental harm will be and what information is lacking or inaccurate in the EAW.
- As much as possible, personalize your comments with mention of how the issues will impact you, your family, farm, or business. If you have health problems that may be impacted by the project, state those. If you are concerned that your well may be affected, give as much specific detail about that concern as possible.

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**On the reverse side of this page is a brief outline of an EAW comment letter to serve as a guide.** Use any of the concerns below that you share and add your own. The strength of this process is in each of us applying our knowledge to analyzing the potential harm of these proposals.

Jason Gilman  
Planning & Environmental Services Director  
177 Main Street  
Winona, MN 55987

RE: Comments on EAW on Dabelstein frac sand mine (OR: Comments on EAW on Yoder frac sand mine)

Dear Mr. Gilman,

I am writing to comment on the Environmental Assessment Worksheet (EAW) for the proposed Dabelstein frac sand mine. **Because of the reasons below, I believe that this project clearly has the potential for significant environmental effects and that an Environmental Impact Statement (EIS) should be required.**

The EAW clearly demonstrates that this mine would have significant potential negative effects on our water resources – both pollution and depletion. The Dabelstein mine is located in an area of moderate to high sinkhole probability. Mining will make sinkhole formation even more likely, increasing the potential for surface pollution to enter our groundwater. Also, the EAW states that water for dust control will be brought to the site in tanker trucks. No details are given on where this water would come from and how much water the mine would actually use. Both these issues must be thoroughly examined in an EIS.

The cumulative effects of the Dabelstein mine, along with the many other frac sand proposals in the same area, have the potential for significant environmental impacts. The Dabelstein mine is one of seven proposed in the immediate area, and the largest frac sand processing plant in North America is proposed nearby. The EAW merely acknowledges the existence of all these proposals and briefly mentions some of their cumulative potential effects. It is clear that these effects are significant and an EIS is needed to study them thoroughly. Among other issues, the cumulative effects of blasting taking place at many mines in the same area, and of the hundreds of trucks per mine travelling on the same roads, are significant potential effects that require further study.

Finally, the scope of the Dabelstein EAW is incorrect. The same company would operate both this mine and the Yoder mine, and the two are clearly part of the same project. The Minnesota Proppant plant is proposed by the same owners and is also part of the same project, as are other mines proposed by the same company. Meaningful environmental review requires that the impacts of complete projects be examined as a whole.

Sincerely,

Name  
Address  
City, State, Zip

c.c. Winona County Commissioners Steve Jacob, Greg Olson, James Pomeroy, Wayne Valentine, Marcia Ward