

February 6, 2013

Jason Gilman, Director
Planning & Environmental Services Department
Winona County Government Center
177 Main Street
Winona, MN 55987

RE: Comment on Dabelstein frac sand mine EAW

Dear Mr. Gilman:

I write to comment on the EAW for the above referenced frac sand mine. I believe that this mine does indeed have the potential for significant environmental effects and the applicants for this mine should therefore be required to complete a full Environmental Impact Statement (EIS). I will outline 3 reasons an EIS must be required for this mine:

- 1. Cumulative Impact.** The EAW does not describe in any detail the long term effects of this mine as it relates to all of the other proposed mines and sand facilities in the immediate geographic area. There are 6 other proposed frac sand mines within a few miles of the Dabelstein mine in Saratoga Twp. and nearby Fillmore County. There is a 300 acre frac sand processing and transport facility proposed a few miles north.

A MN Sands, LLC employee has stated publicly that the company has 9 leases in three different counties. I assume these are Fillmore, Houston, & Winona counties since they have made applications for frac sand mines in each. If the proposed processing/ transportation facility is constructed near St. Charles, it is likely there will be many other frac sand mine applications from this area as the cost of transporting the sand from the mines to a rail or barge loading facility is the most expensive part of the operation.

The combined impacts of all these proposed frac sand mines, the processing/transportation facility, and other potential mines are not adequately addressed in the EAW and must be studied in a comprehensive EIS.

In fact, as I noted to you in a message on Nov. 8, 2012, the Dabelstein and Yoder mines are likely a "phased action" as defined in the MN EQB rules because they: a) have the same proposer, b) are in the same affected area, and c) are timed to be started at about the same time. Both mines will affect the same "impact zone." If the St. Charles facility is added to the 2 mines this is also part of the "phased action" because the same people own both MN Sands, LLC and MN Propant, LLC.

Because these 3 operations are all part of a "phased action" an EIS is mandatory.

- 2. Fugitive Silica Dust:** This dust is a class 1 carcinogen. It is the invisible silica dust which is the most dangerous to human health. The visible dust is less dangerous. There are no provisions for air quality testing either at the mine or on the roads on which the frac sand trucks will run. The MN Dept. of Health staff have publicly informed Winona county residents that there is no research to indicate that silica dust in ambient air around the mine or along haul routes from the mine will be safe for human health. The research has not been done to know this. No where has the amount of frac sand mining, processing, and transportation been done over a period of 5-10 years on such a large scale as is proposed for Winona County. We simply don't know what the effects of 20-50 years of ambient silica dust exposure from 300 trucks per day will be on human health.

Dr. Wayne Feyereisn, an internist at the Mayo Clinic, has stated publicly that the negative health effects of silica dust will not show up in humans for 40 to 50 years. Dr. Feyereisn further indicated that to have any control on the amount of silica allowed in the ambient air there must be standards established for how much silica dust will be allowed. Unlike others states (NY, TX, CA) MN has no standards for the amount of silica dust allowed in ambient air.

With no standards and no monitoring of silica dust created by this mine, the citizens of Winona county will be guinea pigs in a grand experiment to determine how silica dust in ambient air affects human health.

An EIS is needed to study the potential negative health effects of silica dust produced by this mine at it's borders and along the haul routes as trucks will drop small amounts of silica from their tires and underbodies which will accumulate along the routes and be made airborne by every car and truck that travels along the route.

- 3) Cumulative Traffic Impact and Safety:** A Traffic Impact Analysis (TIA) cannot guarantee that the traffic patterns that will develop as a result of the 600 truck trips a day that the mine will bring to Winona county and City of Winona roads and streets will be safe for citizens. Even if traffic patterns are reasonable as outlined in a TIA, a traffic engineer cannot determine what impact heavy, slow accelerating trucks will have as they pull out into a stream of fast moving traffic at regular intervals, what hazards they will create, and how other drivers will (or will not) adapt to these new conditions.

The cumulative traffic impact of the trucks from the Dabelstein mine and all the others that are proposed is not known and understood. It is the responsibility of the Winona county board of commissioners to protect the health, safety, and general welfare of all the citizen of the county. An EIS must be required to study the long term traffic of all the trucks from all the future frac sand mines in the county.

Very truly yours,

Joseph Morse; 23375 Buffalo Ridge Road; Winona, MN 55987