ATTACHMENT
No.1

April 17, 2011

Charlotte W. Cohn, EAW Project Mgr.
Minn. Dept of Natural Resources
Div. of Ecological and Water Resources
500 Layfayette Rd.
St. Paul, Minn. 55155

Subject: Milestone Materials, Rochester Sand and Gravel-N. Quarry

We are greatly concerned about our well that serves 125 families quality water as it has for years. Will the quality remain and will there be any less quanity of water? Who will monitor our water and at whos expense? Who will pay for any legal, engineering, restructering or anything that changes our system.

The height, length and cover of the berm are of concern. We feel the berm should be longer to help the noise factor of trucks hauling so close to the homes. Is the berm cover of such that it will prevent noise and dust? How will it be maintained now and in the future? What about appearance?

Hallmark Terrace Inc.

Wayne H. Laursen

Earlene M. Laursen

Wayne H. Laursen
Earlene M. Laursen
Owners

ROCHESTER

Minnesota

DEPARTMENT OF PUBLIC WORKS
201 4th Street SE, Room 108
Rochester, MN 55904-3740
(507) 328-2400
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April 22, 2011

Charlotte W. Cohn, EAW Project Manager
Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road North
St. Paul, MN 55155

RE: Milestone Materials, Rochester Sand and Gravel – North Quarry Project
Environmental Assessment Worksheet (EAW)

Thank you for the opportunity to provide comments on the EAW for this site, which is only ¼ mile from Rochester's city limits. I am responding on behalf of the Rochester Public Works Department.

We recognize that Milestone Materials is an experienced developer of aggregate and rock materials and has extensive experience with dewatering at other mining sites with a similar hydrogeologic setting and potential dewatering volume. However, Rochester Public Works has not had direct experience with adjacent aggregate extraction with such a large volume of proposed dewatering. Since the EAW does not contain modeled data for this new site or monitoring data from similar mining sites, it is difficult for readers to adequately assess whether or not the described impacts have the potential to be without adverse impacts, as claimed.

Having modeled data translated into maps that show the worst case elevation, gradient and flow direction changes in the groundwater table and river levels at sensitive locations would enable readers to evaluate whether or not dewatering four billion gallons of groundwater per year (333.3 million gallons per month) would have an adverse impact on nearby water resources. Of particular interest to the Public Works Department are effects from pumping on:

- The Rochester Water Reclamation Plant. It is important to know the quantifiable effect on river levels during both low and high flow conditions at the effluent discharge point for the Rochester Water Reclamation Plant, approximately 1.5 miles away. Rochester Public Works would like assurance that dewatering activities will not impact the City's ability to continue meeting its permitted discharge limits.
- The South Fork of the Zumbro River. Without knowing how pumping will impact river levels upstream and downstream of the North Quarry, the City cannot assess whether planned aquifer dewatering and river discharge will affect flood flows leaving the City.
- The Former Rochester Sanitary Landfill. This site was subject to the Minnesota Pollution Control Agency's Voluntary Investigation and Cleanup program. At the time the investigation was completed and the landfill closed, health risks from landfill leachate migration were negligible, in part due to the lack of groundwater receptors. It would be important for the City to know that North Quarry pumping will not induce leachate migration beyond the landfill boundaries or render the monitoring wells non-functional.

- Karst Conduit Flow. It is extremely difficult to predict where preferential flow paths exist within our Karst terrain and how groundwater moves preferentially through them. Dye trace investigations conducted throughout SE MN have shown that under natural conditions flow rates can vary greatly: from miles per day to miles per year. It is conceivable that large volumes of pumping over many years or rock blasting could create new conduits and thereby alter preferential flow paths. Therefore, the permits issued for this site should include a monitoring well network and river monitoring stations that will enable Mathy to monitor long term changes in river levels and in groundwater flow directions and gradients.

It is my understanding that Mathy has contracted with Braun Intertec to further investigate these issues so that they can answer these questions more definitively and give the DNR additional information to incorporate into your responses to comments.

The information provided in the EAW pertaining to the discharge of dewatered water and wash water was confusing. Figures 5 and 6 show the "proposed water treatment plan schematic" and the location of those ponds. There is not a figure showing the location of the dewatering ponds, which are separate. The text (p.4, paragraph 5) indicates that the "process water from the aggregate washing is recycled within the settling ponds and does not discharge to surface water". In contradiction to this statement, Figure 6 shows that there will be an outfall discharging to the South Fork of the Zumbro River. Later, on page 10 in Item 12, it states that dewatering will be undertaken to gain access to the limestone product and that "water is proposed to be pumped from the quarry sump to a series of settling ponds (refer to Figure 6) prior to discharge", thereby inferring that the ponds schematic shown is to be used for both washing and dewatering. Please provide clarification on where each process will be located and where the water from each process will be discharged.

Reclamation (p. 4, paragraph 6 and p.5, paragraph 7) should be done in ways that optimize the potential uses described. A plan for the long-term use of the ultimate constructed lake should be developed prior to beginning operations so that reclamation can proceed with mining. For instance, creating aquatic and terrestrial wildlife habitat as mining is completed in each area could be pursued. In particular, reclamation should be done in a manner that does not present a potential safety hazard for future users of the constructed lake.

We have two items regarding the impact of the project on infrastructure and public services (page 22). First, although this area is not currently in the 2020 Urban Service Area for the City of Rochester, the City does have the capability to serve this site with sewer and water. Second, East River Road has some existing inadequacies related to traffic movement that will be corrected at some point in the future. Although the shift of Mathy's operations from the South to the North Quarry results in no net change in the amount of average daily traffic generated, Mathy's driver's and customers could operate their vehicles with more sensitivity to the traffic issues posed by the intersection and the mixed use of East River Road by industrial, commercial, and recreational drivers.

Mathy has been conducting its operations in Rochester in a responsible manner for many years. They have been sensitive to their neighbors and to the effect of their environmental impacts on Rochester's 100,000+ residents and two million annual visitors. However, permit conditions can be applied that help to insure these positive intentions are implemented and monitored. Thank you for your consideration of these comments.

Sincerely,

Barbara J. Huberty

Barbara J. Huberty,
Environmental and Regulatory Affairs Coordinator

C: Richard Freese, Public Works Director
Chet Welle, Rochester Water Reclamation Plant Assistant Manager
David Lane, Rochester Water Reclamation Plant Environmental Analyst
Todd Osweiler, Rochester Public Utilities Environmental Analyst
Phil Wheeler, Rochester-Olmsted Planning Department Director

Cohn, Charlotte W (DNR)

From: Todd Osweiler [TOsweiler@RPU.ORG]
Sent: Wednesday, April 27, 2011 2:26 PM
To: Review, Environmental (DNR)
Cc: Joe Hensel; Bill Cook; lee.terry@co.olmsted.mn.us; bhuberty@rochestermn.gov; twetzel@mathy.com
Subject: Rochester Sand and Gravel - North Quarry Project (Rochester Public Utilities EAW Comments)
Attachments: RPU's Comments on Milestone EAW 4_25_2011.pdf

Charlotte,

Attached are the comments from Rochester Public Utilities regarding the EAW for Milestone Materials, Rochester Sand and Gravel – North Quarry Project. Please feel free to contact me if you have any questions. Thanks.

Todd

Todd Osweiler
Environmental Analyst
Rochester Public Utilities
4000 East River Road NE
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April 25, 2011

Charlotte W. Cohn, EAW Project Manager
Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road North
St. Paul, MN 55155

RE: Milestone Materials, Rochester Sand and Gravel – North Quarry Project
Environmental Assessment Worksheet (EAW)

Thank you for the opportunity to provide comments on the EAW for this site, which is just over one mile from Rochester's municipal well #28. I am responding on behalf of the Rochester Public Utilities (RPU).

RPU understands that Milestone Materials, A Division of Mathy Construction Company, is an experienced developer of aggregate and rock materials and has extensive experience with dewatering at other mining sites with a similar hydrogeologic setting and potential dewatering volume. We are concerned because of the large volume of water being requested for dewatering, 4,000 million gallons per year, that will be requested through a DNR water appropriation permit. To put that number in perspective RPU appropriated 4,500 million gallons in 2010 for industrial, commercial and residential water use for the entire city of Rochester. Another concern is the fact that the design life of the quarry is 50 years or more and thus impacts may be very long term.

RPU would like to ensure that the City of Rochester's water supply – current and future – won't be impacted by long-term water quality and water quantity consequences. To arrive at an informed conclusion we would like to see the following addressed in the EAW:

- The proposer should provide an estimate in gallons per month for the first year of operation (initial drawdown) and monthly averages thereafter during the on-going maintenance pumping.
- The regional ground-water flow is depicted on EAW Figure 19. What is the local flow direction of the water-table aquifer in the vicinity of the quarry?
- Will the dewatering pumping change the local ground-water flow pattern (i.e. local flow lines)? Will it likely cause the S.F. Zumbro to become a losing steam? If so what reach is likely to be affected.
- What is the magnitude and areal extent of changes to the water-table aquifer, i.e. cone of depression under initial and maintenance mode operation?
- What seasons of the year will the pumping be greatest? What seasons will the water table likely be affected the most?

Rochester Public Utilities, 4000 East River Road NE, Rochester, Minnesota 55906-2813
telephone 507-280-1540 facsimile 507-280-1542 website www.rpu.org

- Will Prairie Du Chien-Jordan aquifer recharge be reduced; if so what is the areal extent, i.e. zone of reduced recharge?
- What is the likelihood of measurable changes to the potentiometric surface in the Jordan? Will we see "weather-normalized" changes in static and pumping water levels in Municipal Well #28?
- Will the site have a monitoring well network and river monitoring stations that will enable Milestone Materials to monitor long term changes in groundwater flow directions and gradients? RPU would like to have the opportunity to review the data collected.
- It might be prudent for the permit to require an assessment after a few years of operation to re-evaluate ground-water impacts. Would a permit extension then be denied if consequences were serious and impossible to mitigate?

It is our understanding that Mathy Construction has contracted with Braun Intertec to further investigate these issues so that they can answer these questions more definitively and incorporate their findings in the responses to comments.

Mathy Construction has been conducting its operations in Rochester in a responsible manner for many years. They have been sensitive to their neighbors and to the effect of their environmental impacts on Rochester's 100,000+ residents and two million annual visitors. However, permit conditions can be applied that help to ensure these positive intentions are implemented and monitored to help protect the City of Rochester's water supply for future generations. Please contact Todd Osweiler at 507-280-1589 or tosweiler@rpu.org if you have questions related to the comments. Thank you for your consideration of these comments.

Sincerely,

Bill Cook,
Manager of Work Management & Integrated Services

C: Tara Wetzel, Mathy Construction Environmental Manager
Terry Lee, Olmsted County Water Coordinator
Barb Huberty, Rochester Public Works Environmental Coordinator

Cohn, Charlotte W (DNR)

From: Lundy, James (MDH)
Sent: Tuesday, May 03, 2011 9:59 AM
To: Review, Environmental (DNR)
Subject: Rochester Sand and Gravel--North Quarry Project
Attachments: Cohn-Milestone-Rochester-materials.pdf

Thanks for the chance to comment on this project. A PDF file is attached with our comments. Expect a hard copy via US Mail shortly.

Jim Lundy
MDH, Source Water Protection

Phone: 651-201-4649
Fax: 651-201-4701
e-mail: james.lundy@state.mn.us

Recd
e-mail
May 3, 2011

MINNESOTA
MDH
DEPARTMENT OF HEALTH

Protecting, maintaining and improving the health of all Minnesotans

May 3, 2011

Ms. Charlotte W. Cohn, EAW Project Manager
Division of Ecological and Water Resources
Minnesota Department of Natural Resources
500 Lafayette Road
St. Paul, Minnesota 55155

Dear Ms. Cohn:

Subject: Comments to Environmental Assessment Worksheet, Milestone Materials, Rochester Sand and Gravel - North Quarry Project, Olmsted County

On behalf of the Drinking Water Protection Section of the Minnesota Department of Health (MDH), I am writing to comment on the Environmental Assessment Worksheet (EAW) for the proposed Milestone Materials North Quarry Project in Rochester, Minnesota. The Drinking Water Protection Section includes wellhead protection planning, a preventive program designed to safeguard public drinking water supplies.

The project area overlaps highly vulnerable portions (see attached figure) of the existing Rochester North Drinking Water Supply Management Area (DWSMA). Because the project site is located over highly vulnerable portions of the DWSMA, please carefully plan project activities to avoid unnecessary contamination of the drinking water supply. I enclose "Wellhead Protection Issues Related to Mining Activities" for your consideration.

Thank you for the opportunity to review and comment on the Draft Scoping Environmental Assessment Worksheet.

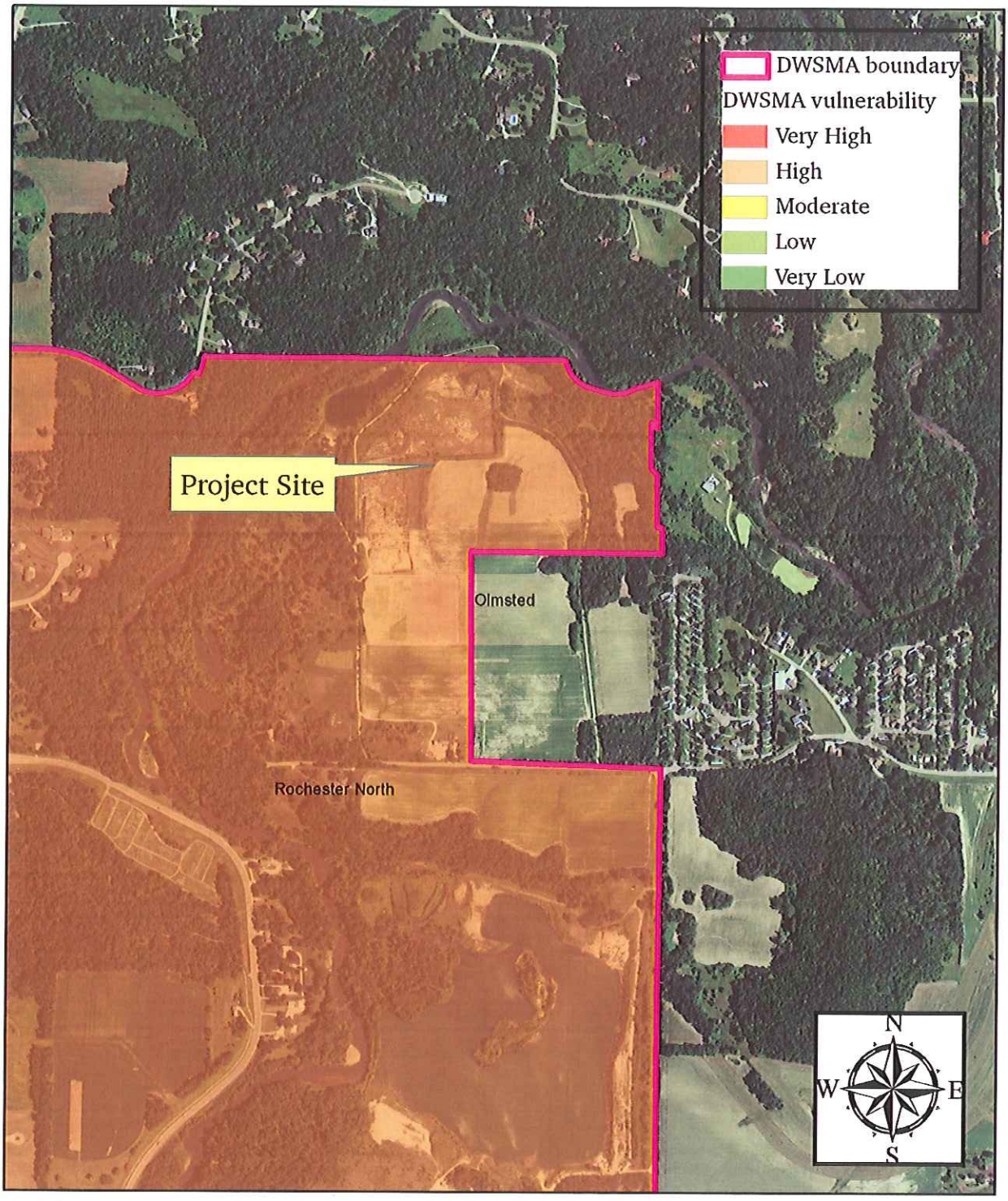
Sincerely,

James R. Lundy, Hydrologist
Environmental Health Division
P.O. Box 64975
St. Paul, Minnesota 55164-0975
651/201-4649

JRL:kmc
Enclosures: Figure, Factsheet
cc: Justin Blum, MDH Hydrologist, St. Paul Office
Mike Baker, MDH Information Technology, St. Paul Office

Environmental Assessment Worksheet Review: Milestone Materials North Quarry Project Area and DWSMA Vulnerability

Prepared April 2011 by Minnesota Department of Health



Wellhead Protection Issues and Strategies Related to Mining Activities
Minnesota Department of Health

Purpose - This document has been drafted in response to requests from local units of government to provide guidance in revising local government land use comprehensive plans, rules, or regulations as they may apply to aggregate mining in drinking water supply management areas in Minnesota.

The use of this document by a local unit of government prior to final review by the Minnesota Department of Health (MDH) is the responsibility of the user and should be reviewed by a local unit of government's legal representative prior to use or adoption.

Background - The impacts that aggregate mining or other mineral extractive land uses may have on the quality of drinking water are a public health concern where the aquifer exhibits sensitive geologic conditions; here there are no protective layers of fine-grained material such as clay or shale to prevent the movement of contaminants into the aquifer. Contamination of the aquifer and drinking water wells could result in the need to install expensive treatment equipment or to greatly limit future capabilities to construct additional wells. Futhermore, contamination of water supply wells may result in expensive legal and remediation costs to the owners of the properties that contributed the contaminants.

Mining of materials within vulnerable portions of a drinking water supply management area (DWSMA) may occur if care is used to ensure that the mining operations, management of the mining area, and reclamation efforts do not present a serious risk to groundwater quality. **The following issues should be considered when conducting mining within vulnerable potions of a drinking water supply management area.**

Following each issue statement is a bulleted list of suggested measures that could be adopted as ordinance language to address a specific drinking water concern.

1) **Issue - The movement of disease organisms into the aquifer within the time period that they remain viable in groundwater.**

   The United States Environmental Protection Agency (U.S. EPA) states that human pathogens may remain viable in groundwater for one to two years. Therefore, sewage treatment systems and/or surface water runoff into aggregate or mineral mining areas that are located in the one- to two-year times of travel for a water supply well should be viewed as a potential source of pathogen recharge to the aquifer.

   - Surface water runoff shall be controlled to avoid infiltration within all vulnerable portions of the DWSMA of a public water supply well.
   - Onsite sewage treatment systems shall be excluded from the one-year time of travel area of a DWSMA.

2) **Issue - Contamination related to fuel and fuel-breakdown products.**

Fuel storage should not occur in areas where geologic cover has been removed and in mining areas. If equipment is fueled in areas where aggregate or minerals are exposed or being mined, it should be done over an impervious pad or other surface where spills can be contained and cleaned up.

Accidental releases of fuel, oil, or automotive liquids may create a contamination plume that could reach a water supply well. A spill emergency response plan should be in-place that identifies how a response to a spill will be implemented, the parties that will be involved, and how the public water supplier will be informed.

- Fuel storage and refueling operations shall not occur in areas where geologic cover has been removed or in mining areas unless conducted on an impervious pad with spill containment.
- Only above-ground storage tanks shall be allowed with approved containment.
- All tanks, regardless of size, must meet county and/or Minnesota Pollution Control Agency rules or regulations that apply to tanks with a capacity greater than 1,100 gallons.
- An emergency spill response plan shall be in-place that identifies: 1) how a response to a spill will be implemented, 2) the parties that will be involved, and 3) how the public water supplier will be informed.

3) **Issue - Contamination related to the storage of equipment, wastes, and hazardous materials.**

Equipment should not be stored or serviced in areas where protective cover has been removed, or in mining areas, in order to reduce the potential for leaking oil, fuel, hydraulic fluid, antifreeze, or other automotive fluids.

- Equipment shall not be stored or serviced in vulnerable portions of a DWSMA unless conducted on an imperious pad or similar surface.
- Waste materials shall not be stored and processed within vulnerable portions of a DWSMA unless conducted on an impervious pad with secondary containment.
- Explosives or other materials used in extractive mining processes shall not be stored or processed within the vulnerable portions of a DWSMA unless conducted on an impervious pad with secondary containment.
- All generated wastes shall be processed in accordance to state and local requirements.
- Storing and processing recycled bituminous materials shall not be allowed within the vulnerable portions of a DWSMA unless conducted on an impervious pad with secondary containment.
- Land spreading animal manures, industrial wastes, or municipal sludge shall not be allowed within vulnerable portions of a DWSMA.
- Landfills shall not be located in vulnerable portions of a DWSMA.

4) **Issue - Operation of a bituminous batch plant.**

An asphalt batch plan should not be located where aggregate is exposed, or in mining areas, to help prevent contamination from entering the aquifer as a result of this activity. This is particularly true if recycled motor oil is used to fuel the plant and if the sludge obtained from asphalt production is not removed or properly managed.

Also, spraying truck boxes with oil should not be conducted in areas where aggregate is exposed or in mining areas. This will reduce the risk that spills, over-application of oil, or leaking oil storage tanks present for aquifer contamination.

- An asphalt batch plant shall not be located within the vulnerable portions of a DWSMA unless located on an impervious pad with secondary containment.
- Spraying truck boxes with oil shall not be conducted within the vulnerable portions of a DWSMA unless located on an impervious pad with secondary containment.

5) Issue - Groundwater withdrawal related to mining operations.

Locating a well that may be used to provide wash water, or to dewater the site, should address impacts that pumping may have on changing the capture zone for a public water supply well. Altering the capture zone may require changing the boundaries of the wellhead protection area, add potential contamination sources, and increase the rate of vertical recharge to the aquifer used by the public water supply well.

- Prior to locating a well that may be used to provide wash water or dewater the site, the applicant shall address the impacts that groundwater pumping may have on altering the DWSMA boundary or vulnerability of the public water supply well(s).
- A groundwater appropriation permit is required from the Minnesota Department of Natural Resources prior to any use of a high-capacity well associated with a mining operation.

6) Issue - Wells in mining areas.

Wells that are constructed into or through an aquifer used by a public water supply well may become direct pathways for contaminants to enter the aquifer if: 1) they were not properly constructed, 2) they are not adequately maintained, or 3) contaminants are stored or used too closely to them. Therefore, all wells within proposed mining areas should: 1) be accurately located, 2) be constructed according to MDH standards, and 3) have status of use determined.

In 1999, the U.S. EPA finalized the *Underground Injection Control Regulations for Class V Injection Wells*, known as the Class V Rule, Phase 1. The Class V Rule establishes minimum federal standards for two types of Class V wells that are of concern in a DWSMA: ***large-capacity cesspools*** and ***motor vehicle waste disposal wells***. These types of wells are also know as ***shallow disposal systems***. The Class V Rule also established an inventory and permitting process for large-capacity septic systems.

- Prior to mining an inventory of all wells, including shallow disposal systems, shall be conducted within the portions of a DWSMA proposed for mining activities.
- Prior to the start of mining operations, all water supply wells located within the proposed area to be mined shall be reviewed by a licensed well driller to determine if the well(s) require repair or sealing in accordance with Minnesota Rules, Chapter 4725.
- All potential contaminant sources shall meet state required setbacks to all wells.
- Construction of new large-capacity cesspools and/or motor vehicle waste disposal wells are prohibited within a DWSMA.
- Existing large-capacity cesspools and/or motor vehicle waste disposal wells must be permitted by the U.S. EPA.

7) Issue - Illegal dumping or other uses of mining areas.

Mining areas should be managed by controlling access to prevent the public from using mining areas to dispose of waste or other unwanted material, or for recreational activities. Without proper access controls, mining areas can become a disposal area for materials such as old vehicles and equipment, demolition debris, industrial/commercial waste, household wastes, tires and similar types of wastes. This can create nuisance conditions that may be detrimental to human health.

- Mining areas shall be managed to prevent the public from using mining areas to dispose of waste, vehicles and equipment, demolition debris, industrial/commercial waste or other unwanted material.
- Mining areas shall not be used for recreational purposes, such as off-road vehicles, discharging firearms or other similar types of land uses, unless specifically allowed as part of the mining permitting process.
- Mining areas shall not be used for stockpiling or spreading of animal manures.

8) Site reclamation.

Plans for reclaiming land that is mined or stripped of geologic cover should address how future land use or surface-water drainage will be controlled to reduce the direct infiltration of contaminants into the aquifer. Proposed land-use practices other than open space should be evaluated for their potential risk to groundwater quality. Also, surface drainage from adjacent properties must be diverted away from the mining area so that it does not infiltrate into the ground or directly enter groundwater in areas where aggregate or minerals are exposed or where the water table is exposed in a former pit.

- Plans for reclaiming land that is mined or stripped of geologic cover shall address how future land use or surface-water drainage will be controlled to reduce the direction infiltration of contaminants into the aquifer.
- Site reclamation plans shall use a minimum of two (2) foot contours.
- Proposed land-use practices shall be evaluated for their potential risk to groundwater quality.
- Surface drainage from adjacent properties shall be diverted away from the mining area so that it does not infiltrate into the ground or directly enter groundwater in areas where aggregate or minerals are exposed or where the water table is exposed in a former pit.
- Reclamation shall be phased in as mining progresses, with time of travel areas for public drinking water supply wells having the highest priority for reclamation.
- Topsoil shall be replaced over all portions of a vulnerable DWSMA to a depth sufficient to support vegetation.
- Vegetation used for reclamation shall be native species or similar species that do not require regular or seasonal applications of nutrients or pesticides.

Definitions from Minnesota Rules, part 4720.5100:

Drinking Water Supply Management Area (DWSMA) - subp. 13.
DWSMA Vulnerability - subp. 14.
Groundwater - subp. 17.
Public Water Supply Well - subp. 29.
Time of Travel - subp. 36.
Well Vulnerability - subp. 42.

Cohn, Charlotte W (DNR)

From: Michael Brown [brownmk@charter.net]
Sent: Tuesday, May 03, 2011 11:40 AM
To: Review, Environmental (DNR)
Subject: "Rochester Sand and Gravel - North Quarry Project"
Attachments: Rochester Sand and Gravel EAW Comments.pdf

Dear Ms. Cohn

Attached, please find my comments regarding the EAW for the subject proposal.

Thank you,

Michael Brown
6002 Buck Hill Ct. NE
Rochester, MN 55906

Michael Brown
6002 Buck Hill Ct. NE
Rochester, MN 55906
May 3, 2011

Charlotte W. Cohn
EAW Project Manager
Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road
St. Paul, MN 55155

RE: Rochester Sand and Gravel – North Quarry Project

Dear Ms. Cohn:

Thank you for the opportunity to provide comments on the EAW prepared for the Rochester Sand and Gravel – North Quarry Project. I am writing to express my concern with several aspects of the project as described in the EAW. As documented by the EAW, I find the consideration for, and the safeguarding of the interests of local residents to be inadequate. For clarity I have organized my comments according to the corresponding sections of the EAW.

Section 13

According to the EAW the dewatering operations will remove approximately 4 billion gallons of water annually from the local aquifer. For perspective, this is an amount equal to the annual water consumption of the entire city of Rochester, Minnesota(1). However, unlike the city of Rochester, this proposed extraction from the aquifer will occur at a single point as opposed to a series of geographically distributed wells. Accordingly, it should be expected that this will impose a cone of depression potentially impacting local private wells. Further exacerbating this cone of depression is the nature of the local aquifer. According to USGS data(2), Olmsted county has a moderate transmissivity that leads to sustained lowering of water levels due to ground water withdrawals. The same USGS data shows an already existing historical trend of lowering water levels. Aside from noting anecdotal experience from the applicant, the EAW submission does not address the long term impacts to the local aquifer nor does it offer independent assessments of the potential impacts to local private wells.

Page 11 of the EAW states "At a number of these other quarries in similar geologic and hydrologic settings completed by the project proposer, adverse affects to water resources or to the availability of water resources to nearby domestic wells have not occurred". This is not a definitive statement and indicates that some projects have created adverse effects. Accordingly, the proposer's assertion of no impacts to surrounding wells should

not be accepted without independent assessments. Additionally, the proposer offers no mention of the remediation and consideration provided to the affected parties.

On page 12 of the EAW the proposer discusses dewatering operations at similarly situated quarries. However, the comparisons are not equal. At the existing South quarry, the majority of the local structures receive water from the Rochester municipal supply. At the Goldberg quarry, the housing density within the surrounding area is markedly lower than that at the proposed North quarry.

Finally, the project proposer states that any claims of water interference will be handled according to the Minnesota DNR Well Interference process. This offers scant protection for an owner of a private well. Per the process the affected well owner must perform and submit well test information to a regional hydrologist. If an investigation is performed, and if an interference condition is confirmed, the permitee has 30 days to choose one or more actions. At the permitee's option this may be nothing more than requesting a public hearing. Throughout this process, the affected homeowner is left with an impaired well with no recourse and no clarity as to a resolution.

Section 21

As noted in the EAW, access to the proposed North quarry will be via 55th street which is a township road. Beyond the intersection with East River Road and to the East, 55th street is ill-suited to truck traffic. The road winds and has several elevation changes leading to numerous blind curves. Additionally, the road shoulders are minimal and offer few options for safely navigating opposing truck traffic. Accordingly, 55th street beyond the intersection with East River Road should not be considered an acceptable route for connecting to local traffic arteries.

Section 24

In section 6 of the EAW the project proposer states that no specific noise limitations or restrictions are planned in order to reduce the impact on nearby residences. Further, the applicant states that the quarry operations may last until 8:00 PM throughout the summer. Instead, the applicant is relying upon earthen berms and quarry walls to shield nearby residences from the noise generated by the various crushing, hauling, and blasting activities. However, during the early operation of the quarry, these activities will be at, or above, ground level and thus not shielded from nearby residences. Without specific mitigation, the surrounding residences will be subject to the full intensity of the quarry operations.

To mitigate the migration of dust from the quarry site the project proposer has simply offered a general intent to employ water spraying to settle any dust. This general statement lacks the specificity required of a mitigation plan. The proposer has not addressed the frequency of water spraying, the atmospheric conditions under which crushing or stock movement operations should be suspended, nor the actions to reduce

the amount of stockpiles that may lead to dust generation. Further, the project proposer has not offered remediation actions in the event of adverse impacts on surrounding properties.

Notably lacking from the applicant's submission is mention of the controls for ground vibration resulting from the shot rock blasting. No plan is offered to monitor for ground vibration nor are control limits for allowable ground vibration discussed. In the event of damage to surrounding structures, no remediation plan is offered.

Section 26

The applicant states the quarry may be visible from the homes on the surrounding hilltops to the west and north. These homes are already visible from 55th street and thus are visible to all parts of the proposed quarry. It should thus be expected that these homes will be visually impacted by the quarry operations, especially those conducted with artificial illumination.

Section 27

The EAW states that county zoning provisions do not specifically apply to the proposed project and that zoning and land use provisions are addressed by the Township Cooperative Planning Association (TCPA) as the zoning agent for Cascade Township. As state law only allows for a township to impose more stringent ordinances, the County ordinances do apply in as much as they establish a minimum set of conditions or restrictions.

Section 29

The EAW states "There are no known past, present, or reasonably foreseeable future projects that may interact with this project in such a way as to cause a cumulative potential effect". Given the absence of an independent hydrological analysis of the aquifer impacts from the proposed dewatering how is it possible to state that there will be no cumulative effects from this project when combined with the past and present surrounding quarry projects?

As stated above, I am concerned over the lack of consideration for, and safeguarding of, the interests of the residents surrounding this proposed quarry project. Specifically, the potential environmental impacts present a significant exposure to the health, welfare, and investments of the nearby population. Anecdotal experience and general statements of intent or hope are poor substitutes for sound scientific analysis and well constructed, thoughtful, and detailed plans.

I want to thank you again for the opportunity to offer comments on the EAW for this proposed project. I am not opposed to quarry projects as they serve a vital and necessary

role in maintaining and building our shared infrastructure. However, I believe there are steps that can be taken to reduce or mitigate the environmental impact to nearby residents. Those steps are not evident in this EAW.

Sincerely,

Michael K. Brown

(1) Data from Rochester Public Works website FAQ available at http://www.rpu.org/education/faq/

(2) Data from USGS available at http://pubs.usgs.gov/ha/ha730/ch_j/J-text8.html

Cohn, Charlotte W (DNR)

From: Collins Lori [collins.lori@co.olmsted.mn.us]
Sent: Tuesday, May 03, 2011 1:42 PM
To: Review, Environmental (DNR)
Subject: Milestone Materials, Rochester Sand and Gravel - North Quarry Project
Attachments: Milestone Materials, Rochester Sand and Gravel.pdf

Please see attached per Terry Lee. Hard copy to follow. Thank you.

COUNTY OF Olmsted

Department of
ENVIRONMENTAL RESOURCES
2122 Campus DR SE – Suite 200
Rochester, MN 55904-4744
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507.328.7070

May 3, 2011

Charlotte W. Cohn, EAW Project Manager
Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road North
St. Paul, MN 55155

RE: Milestone Materials, Rochester Sand and Gravel – North Quarry Project Environmental Assessment Worksheet (EAW)

Thank you for the opportunity to comment on the Environmental Assessment Worksheet for the Milestone materials, Rochester Sand and Gravel- North Quarry project. I am providing these comments on behalf of Olmsted County.

Permits and approvals required (page 7, #8): Staff from the Rochester-Olmsted County Planning Department are reviewing the available information to assess the need for local permits. The Department will be submitting that information in their comments on the EAW.

Fish, wildlife, and ecologically sensitive resources (page 8, #11): The impact of ground water withdrawals on wetlands and the Zumbro River during low-flow periods ought to be considered in this section of the EAW. A table comparing the ground water withdrawal and surface water discharge to historical low flow conditions in the Zumbro River would be useful.

Erosion and sedimentation (page 10, #13): This section of the EAW ought to also include a description of the any stream bank erosion in and downstream of the site that may result from the water discharge.

Water use (page 10, #13): The withdrawal of 4 billion gals per year that will be required for dewatering the pit is comparable in volume to the entire municipal pumpage of the Rochester Public Utilities. Additionally, the proposed withdrawal is near a permitted dewatering pumpage comparable in volume at the South Quarry and a slightly larger permitted withdrawal at the Goldberg Quarry to the north. The North Quarry Project is also located near Rochester Public Utility municipal well #28. The EAW should provide more information on the likely extent of the aquifer impact of the requested withdrawal at the North Quarry as well as the likely combined impact of all of the permitted pumping at the sites noted above. As is shown in Figure #13 through 18, most of the homes in the area are served by privately owned and operated wells. The analysis in this section ought to also assess the likely impact on those wells.

Water quality (page 14, #17): Information should be provided in the EAW that compares the permitted quality of discharge water to the current water quality conditions in the Zumbro River. How will the impairment status of the Zumbro River specifically be considered in the discharge permit? How will the discharges affect stream bank stability in the area of the discharge as well as in the area downstream?

Additionally, the EAW should consider the impact of blasting residues on ground and surface water quality.

Stationary source air emissions (page 19, #23): The environmental impact of airborne releases associated with blasting should also be considered.

Odors, noise, and dust (page 20, #24): On page 4, paragraph 1, the EAW notes that: *"At the present time, specific noise limitations or restrictions to reduce possible effects on nearby residences and neighbors or on wildlife resources are not planned or proposed."*

The site is immediately adjacent to the Hallmark Terrace Manufactured Home Park. Hallmark Terrace has a resident population that for Olmsted County is disproportionately higher in minority residents, with limited proficiency in English, and with lower than average median household incomes. The EAW comment noted above, suggests that this population will not be provided with specific noise limitations or restrictions that would be expected if a local permit were required. The EAW ought to more fully discuss this impacted population in this section and in the section on Cumulative potential effects.

Compatibility with plans and land use regulations (page 21, #27): The EAW should consider the injury risk that the site poses during its operation and after reclamation. The site is near two manufactured home parks -- Hallmark Terrace and Zumbro Ridge Estates and falls along the quarry-created cliffs should be considered in the EAW. Additionally, the risk of drowning in the water body created by quarrying ought to be considered.

More information should be provided about the proposed reclamation plan and the sites intended use. Steep-sided quarry walls and deep cold water create unique drowning hazards and a reclamation plan should be included that minimizes that risk.

Again, thank you for the opportunity to comment on the EAW.

Sincerely,

Terry Lee, Environmental Services

C: Chris Larson, Olmsted County Environmental Commission Chair
John Helmers, Environmental Services Director
Phil Wheeler, Rochester-Olmsted Planning Department Director

Cohn, Charlotte W (DNR)

From: Harford John [harford.john@CO.OLMSTED.MN.US]
Sent: Wednesday, May 04, 2011 9:44 AM
To: Review, Environmental (DNR)
Subject: Rochester Sand and Gravel - North Quarry Project
Attachments: Comments on Milestone EAW 4-22-11.docx

Attached you will find comments from the Rochester-Olmsted Planning Department. Thank you for the opportunity to provide comments.
John Harford, Senior Planner
Rochester-Olmsted Planning Department

FAX

Rochester-Olmsted Planning Department
2122 Campus Drive SE, Suite 100
Rochester, MN 55904
Phone Number: 507-328-7100

Date: 5/4/11	Number of pages being faxed: (including this cover):
TO: Charlotte W. Cohn DNR	From: [illegible]
Fax Number: 651-297-1800	Phone Number: 507-328-7124
Phone Number:	Fax Number: 507-328-7958

Regarding: EAW – Rochester Sand and Gravel – North Quarry Project

- ☐ Confidential
- ☐ Urgent
- ☐ For Review
- ☐ Please Comment
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● Comments:

ROCHESTER-OLMSTED PLANNING DEPARTMENT
2122 Campus Drive SE, Suite 100 • Rochester, MN 55904-4744
www.co.olmsted.mn.us/departments/planning
COUNTY OF Olmsted

May 3, 2011

Charlotte W. Cohn, EAW Project Manager
Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road North
St. Paul, MN 55155

Dear Ms. Cohn:

This letter is in response to the MNDNR notice for the Environmental Assessment Worksheet for Milestone Materials, Rochester Sand and Gravel – North Quarry Project. Rochester-Olmsted Planning Department has comments on the EAW contents regarding

- local permitting, application of county and township land use controls,
- data regarding dewatering impacts,
- mining operations, and
- site and reclamation plans.

The EAW indicates throughout that the proposed mining operation is an expansion of limited mining activities on the site. Aerial photography indicates some mining occurred during the 1970's and possibly again in the 1999-2000 time period. There appears to have been no activity on the site since that 2000 time period on three of the six properties included in this EAW. Unless the operator can establish a record showing a history of continued use of the site for mining, the use will need to go through rezoning and conditional use permit approval processes. This is of importance to local units of government in the application of the county land use plan and the township and county zoning ordinances. The permitting section of the EAW will need to be corrected to reflect the local permitting that will be necessary based on the proposed use, past use, and the requirements of the zoning ordinances. Section 8 of the EAW provides a list of permits and status that will need to reflect the following:

- Olmsted County – Rezoning of the property,
- Cascade Township – Rezoning of the property, Conditional Use Permit, Erosion Control and Runoff Control Plan (Review by the City of Rochester Public Works Department).

Section 13 and other sections address and summarize proposed dewatering and groundwater use for washing of materials mined from the site. The EAW does not attempt a detailed review of possible impacts but appears to be a broad review of possible impacts that need further review. The department concerns are:

- Lack of review of potential impacts on nearby potable water wells that serve primarily residential areas and is their only source of water.
- The EAW states that there will be no impact on adjacent wetlands but there is no documentation to support the conclusion. A detailed review of the potential impact on adjacent wetlands would provide a basis for making a determination on impact. No on-site wetland delineation has been completed and reviewed by the LGU Technical Advisory Committee so there is incomplete information about the hydrology that supports those wetlands.
- The statements pertaining to the closure of the operation to the south and the start of dewatering on the proposed north mining operation appears not to be determined at this time. Will dewatering continue on the south operation as it is initiated on the proposed north mining operation such that there would be a larger cumulative impact on groundwater withdrawal that has not been noted in the EAW?

The EAW provides a tentative site plan and a general description of the operation over time, however, some further explanation would be useful in determining impacts to the site and surrounding area.

- The site plan shows the general location of the proposed dewatering sump and sediment ponds. The EAW does not indicate if there are reasonable alternative locations. It appears that the Stage #3 pond could be located within the 100 year floodplain which raises questions about operation during flood events. Reference is made also to wash water settling ponds but none are shown on the site plan and the description in the document is confusing.
- Blasting is mentioned as part of the mining operations for the limestone on site. However, there is no explanation of possible need for monitoring of adjacent private wells and the possible impact on those wells by the blasting activities.
- The EAW addresses noise to a limited extent and the possible reductions of noise at the property lines by the material stockpiles and berms on the site. However, there is no description of possible location of crushing machinery or other machinery that will create substantial noise during operations. Information about the noise levels expected at sensitive receptors should be provided.
- Reference is made to occasional storage and crushing of concrete and asphalt. The document does not indicate if there is a limit to the storage of this material on site nor where or how it will be stored.
- Section 21 covers traffic including average daily truck trips. However, it does not discuss the change in the use of the road system and the condition or need for improvements of East River Road north of the entrance to the existing south mining operation.

Site and reclamation plans are included in the figures and text of the EAW. The site plan is too general for the purposes of a detailed analysis under local zoning requirements, and there is no reclamation plan that is included as part of the EAW. The following are concerns recognizing the limitations of the site plan.

- Explain the concept of "progressive reclamation" and how it will apply to this site.
- A more detailed review of a detailed site plan may be necessary to make sure that the proposed berms are not located within the FEMA designated floodplain as shown on Figure 21.
- A grading plan will be necessary to make sure there are not offsite stormwater runoff problems that are created by the construction and placement of the proposed berms. A grading plan will

also provide information on possible impacts to the floodplain and shoreland areas on the site and conformance with the related regulations.

- A more detailed reclamation plan would provide information concerning the ultimate subsurface contours of the lake when dewatering is discontinued. Sheer walls at the water's edge create a serious safety issue and are not conducive to a stable shoreline and the establishment of aquatic vegetation for wildlife which is mentioned as part of a possible reclamation goal. A reclamation plan providing for sheer walls in areas under water will not meet local standards for reclamation.
- Storage pond #3 appears to be located on a "steep slope" based on the soils information. The shoreland rules do not permit the removal of vegetation on "steep slopes". The site plan should reflect the requirements of the floodplain and shoreland rules.

Thank you for the opportunity to provide comments on this Environmental Assessment Worksheet.

Sincerely,

John Harford
Senior Planner
Rochester-Olmsted Planning Department

Minnesota Department of Transportation
District 6, Rochester/Owatonna
2900 48th Street NW
Rochester, MN 55901-5848

Fax

Office: 507-286-7598

Fax: 507-285-7279

To: Charlotte W. Cohn
Fax: 651-297-1500
Phone:
Re:

From: Mark Schoenfelder
Date: 5-4-2011
Pages:
CC:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply

Comments:

EAW Milestone Materials, Rochester Sand and Gravel, North Quarry Project

Minnesota Department of Transportation
District 6, Rochester/Owatonna
2900 48th Street NW
Rochester, MN 55901-5848

Office: 507-286-7552
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mark.schoenfelder@state.mn.us

May 4, 2011

Charlotte W. Cohn, EAW Project Manager
Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road
St Paul, MN 55155-4025

RE: Environmental Assessment Worksheet (EAW); Milestone Materials, Rochester Sand and Gravel, North Quarry Project
CS 5510 US 63

Dear Ms. Cohn:

Minnesota Department of Transportation (Mn/DOT) District 6 Planning staff has reviewed the EAW for the Milestone Materials, Rochester Sand and Gravel, North Quarry Project. Milestone Materials proposes to expand aggregate mining operations within the North Quarry (an approximately 70 acre site). This expansion requires the extraction of limestone aggregate from 60 feet to 120 feet below grade. Site access will be to 55th Street NE in the city of Rochester.

Mn/DOT District 6 offers the follow comments:

Item 21 Traffic:

- This item should indicate where trucks will be entering and exiting existing roads and highways. Presently, the South Quarry traffic uses East River Road to 37th Street, which has 4 lanes, a dedicated left turn, as well as a traffic signal. It is preferable that truck traffic use this access (and the new 41st Street connection during the 37th street construction).
- Mn/DOT has safety concerns regarding trucks using the 55th Street connection to US Highway 63. US Highway 63 is a two-lane, curved roadway, posted at 55 MPH with No Passing Zones. The acceleration time needed for trucks will lead to speed conflicts, delays and frustrations for the traveling public.

Thank you for providing Mn/DOT the opportunity to comment. If there are any questions, you may contact Debbie Persoon-Bement, Transportation Specialist at (507) 286-7598, or Greg Pates, Principal Planner at (507) 286-7680.

Sincerely,

Mark Schoenfelder
Acting Planning Director

cc: Tara Wetzel, Environmental Manager, Milestone Materials
Greg Paulson, Chris Moates, Nancy Klema, Thomas Streiff, Craig Hansen, Greg Pates, Debbie Persoon-Bement, file

Cohn, Charlotte W (DNR)

From: Osborn, Mary (MPCA)
Sent: Wednesday, May 04, 2011 1:57 PM
To: Review, Environmental (DNR)
Cc: Kromar, Karen (MPCA); Kolar, Jim (MPCA); Watkins, Justin (MPCA); Keseley, Shaina (MPCA); Finley, Robert (MPCA)
Subject: MPCA Comment Letter - Milestone Materials, Rochester Sand and Gravel - North Quarry Project

Attached are the Minnesota Pollution Control Agency's comments on the Milestone Materials, Rochester Sand and Gravel – North Quarry Project
Environmental Assessment Worksheet. A paper copy will follow by U.S. mail.

Please acknowledge receipt of this comment letter to Karen Kromar at karen.kromar@state.mn.us

Thank you.

Milestone
aterials North Qua

Mary Osborn
Minnesota Pollution Control Agency
Environmental Review Unit
Regional Division, 4th Floor
520 Lafayette Road
St. Paul, MN 55155-4194
651-757-2101
mary.osborn@state.mn.us

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May 4, 2011

Ms. Charlotte Cohn
EAW Project Manager
Minnesota Department of Natural Resources
Division of Ecological and Water Resources
500 Lafayette Road
St. Paul, MN 55155

Re: Milestone Materials, Rochester Sand and Gravel – North Quarry Project
Environmental Assessment Worksheet

Dear Ms. Cohn:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Milestone Materials, Rochester Sand and Gravel – North Quarry Project (Project) in Olmsted County, Minnesota. The Project consists of the expansion of limestone aggregate mining operations within the Rochester Sand and Gravel North Quarry. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, MPCA staff has the following comments for your consideration.

Stationary Source Air Emissions (Item 23)

This section states that a portable crushing plant may be moved into the expansion area and that a diesel generator will be used to power the crusher. The Project proposer needs to determine if this generator, based on its size, model year, non-emergency status, and if it is considered to be portable or stationary, is subject to federal National Emissions Standards for Hazardous Air Pollutants, Subp. ZZZZ. If you have any questions on air permitting issues, please contact the MPCA Small Business Environmental Assistance Program in our St. Paul office at 651-282-6143.

Cumulative Potential Effects (Item 29)

This section of the EAW states that "there are no known past, present or reasonably foreseeable future projects that may interact with this project in such a way as to cause a cumulative potential effect." The EAW also states that there is a quarry mining operation located to the south and east of the Project area that is currently active but nearing the end of its life. Information on the timing of the phasing out of the south quarry while the proposed north quarry comes on line would be useful in determining if there will be an overlap of mining activities that would have the potential to contribute to cumulative potential effects.

We appreciate the opportunity to review this Project. Please provide your specific responses to our comments and notice of decision on the need for an Environmental Impact Statement. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this EAW contact me at 651-757-2508.

Sincerely,

Karen Kromar

Karen Kromar
Planner Principal
Environmental Review and Feedlot Section
Regional Division

KK:mbo

cc: Craig Affeldt, MPCA, St. Paul
Jim Kolar, MPCA, St. Paul
Justin Watkins, MPCA, Rochester
Shaina Keseley, MPCA, Rochester
Bob Finley, MPCA, Mankato

TOWNSHIP COOPERATIVE PLANNING ASSOCIATION

4111 11th Avenue SW Room 10
Administrator
Rochester, MN 55902
Administrator

Asst.
Phone: (507) 529-0774
Fax: (507) 281-6821

Roger Ihrke,

Gary Pedersen,

Barbara Literski, Adm.

-- TCPA –

5/3/11

Charlotte W. Cohn
Environmental Planner and EAW Project Manager
500 Lafayette Road
St. Paul, MN 55155-4025

Subject: Rochester Sand and Gravel – North Quarry Project

Dear Ms. Cohn:

At the May 2, 2011 regular meeting of the Cascade Town Board our office was authorized to make the following comments on the above mentioned EAW.

These comments reflect the past experience the Township has had with mining operations and the operator making this proposal.

The present operator has been very good to work with and is concerned with environmental issues. Future owners and operators may not be as willing to mitigate Township concerns.

The Board and its constituents struggle with any operation that could adversely affect water supplies within the Town. When a well within the area of this type of operation no longer performs as it has been, the proof of those affects seems to be shifted to the person whose water supply has changed and not the applicants. There should be a stricter standard in place to allow for mitigation of well issues that would not put the burden of proof on residential well owners who have no monetary gain from the development.

The applicant is working with Olmsted County in its process of constructing a new roadway though the property. The roadway is still in the development/acquisition stage. Until this roadway is complete only roadway adjoining the north quarry is a five ton township road. If the applicant proposes to access the roadway system from the south quarry, materials would have to be moved across the township roadway too reach that access. Use of this roadway system for trucks in its present state would not be allowed.

Controlled access points should be established prior to any permits being issued for the site. This would normally be done through the zoning process. The applicant has a letter from Olmsted County indicating that the use is considered a non-conforming use of which no conditional use permit or other zoning action would be required. The applicant will need to provide the town with proof of continuous use since its initial start up. In addition the letter is vague as to which parcels are being

referred too. The Counties parcel map indicates two separate tax parcels make up the north quarry proposal. The applicant will need to provide information about these parcels and show why they are two separate tax parcels.

The applicant is proposing to construct berms around most of the perimeter of the property. These berms are for both visual and noise mitigation. A manufactured housing development of approximately 130 homes is on the adjoining property to the east. The applicant should take special care during the construction of these berms to be sure that the operation does not exceed reasonable hours to protect the neighbor's rights to maintain a quality of life without excessive noise and lights at unreasonable times. During the blasting portion of the operation the applicant stated at the Olmsted County Environmental Commission Meeting that they would be willing to notify any neighboring property owner who wished to be notified prior to blasting. This offer is gracious and the Board would like to remind them of the statement.

Mitigation of dust should to be addressed. Stockpiles of materials have often exceeded the height of the berms leaving large areas of materials exposed to the wind. Either the height of stockpiles should be limited or sprinkled with water. The applicant has provided the Town with their "Best Management Practices; Milestone Materials 2011. Controlling dust from stockpiles is not included within this plan.

The plan, as presently proposed does not provide enough protection for the Township residents. Although the issues may not meet the level of requiring an EIS, the applicant should meet with the Township to mitigate the open issues prior to moving forward with the operation.

Thank you for the opportunity to comment on this proposed project.

Sincerely,

Roger P. Ihrke

Roger P. Ihrke
Cascade Township Zoning Administrator