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BY ~~D~~edicated to a Strong Greater Minnesota

September 6, 2012

Commissioner Dave Frederickson, Chair  
Environmental Quality Board  
520 Lafayette Road North  
Saint Paul, MN 55155

Dear Commissioner Fredrickson and Members of the Environmental Quality Board,

We are writing to you on behalf of the Coalition of Greater Minnesota Cities to express our support for a Generic Environmental Impact Statement (GEIS) on the issue of Industrial Silica Sand (ISS) mining. The CGMC is an organization of more than 75 cities that advocates on a variety of issues that affect our members in rural Minnesota. A number of our member cities are located within the region of the state with significant ISS deposits.

As the level of ISS mining, processing and transportation continues to increase, our cities are facing tough questions that require the balancing of many interests but they lack the resources and knowledge to address them adequately. The CGMC supports a GEIS to study the cumulative impacts of ISS because it could provide local governments with a better understanding of how to address this rapidly expanding industry.

Our cities have questions regarding a number of areas:

- 1) Health Impacts and Monitoring. Are there health impacts to the public of the silica dust from ISS mining, processing or transportation? What standard should be used for ambient silica? How should this be monitored?
- 2) Environmental impacts. Could increased mining affect our water supplies, particularly as the mines dig deeper? Does the blasting and vibrations damage homes and other structures near mines?
- 3) Infrastructure impacts and funding. The mining and transport of ISS can increase costs for local governments, particularly cities, which may not be adequately compensated through property taxes. Are there revenue mechanisms that could be used to address this revenue challenge? How does ISS transport affect the structural integrity of state, county, and federal roads and bridges that run through our community? Will there be adequate planning and funding to address accelerated deterioration of those roads and

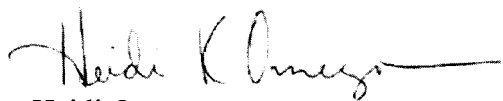
bridges that could result from the transportation? Additional ISS truck traffic also causes routing, congestion and safety concerns for pedestrians and bikers. What are the best practices for addressing these concerns?

- 4) Tourism impacts. How will increased mining affect the tourism industry in our communities, and how could any negative impacts be mitigated?
- 5) Regulatory clarity. Although our cities generally understand their responsibilities, a clear demarcation of regulatory responsibility of local governments and the state would be helpful.
- 6) Mitigation Guidance. What are best practices for mitigating any negative effects of the mining, processing and transport of ISS, including state or local regulation?
- 7) Public information and awareness. As we learn more about the actual impacts of ISS mining, processing, and transportation, how can cities effectively communicate that information with our residents? Can the state assist local governments in communicating with citizens?

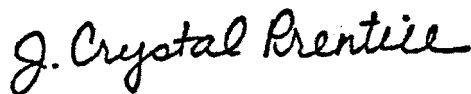
The CGMC believes that a GEIS is the best method for addressing questions such as these about a rapidly expanding industry that will affect many communities throughout Minnesota. Although the CGMC supports the ability of local units of government to impose temporary moratoria, we remain neutral on the question of whether a statewide moratorium on ISS mining should be imposed. We neither support nor oppose the portion of the petition requesting such a statewide moratorium.

In summary, the CGMC urges the EQB to perform a GEIS to address the environmental and health concerns raised by large scale Industrial Silica Sand mining. If you have any further questions regarding our position, please contact our environmental lobbyist, Elizabeth Wefel, with Flaherty & Hood, P.A., at 651-259-1924 or [eawefel@flaherty-hood.com](mailto:eawefel@flaherty-hood.com).

With warmest regards,



Heidi Omerza  
Co-Chair, CGMC Environment Committee



Crystal Prentice  
Co-Chair, CGMC Environment Committee

cc: Bob Patton, EQB