From: sramthun@chartermi.net
To: MNEQB@public.govdelivery.com; *EQB_Silica Sand
Subject: RE: EQB extends public comment period on "Tools to Assist Local Governments"
Date: Tuesday, December 31, 2013 2:28:46 PM
Attachments: Plant science-hyperaccumulation-heavy metals.pdf
STRIPS prairie seed thesis-Sara Hirsh.pdf

Holiday greetings,
I just finished reading the "Tools to Assist Local Governments" document and was impressed with its depth and breadth- well done!

I have a few comments and/or questions.

1) I attended a Praire Conference presentation of a study Iowa State did on using native plants as a buffer between farm fields and water sources. Might this type of vegatation also be required by DNR/EQB for mining buffer areas to decrease surface water/runoff contamination? Enclosed is the paper and also a document discussing the contaminate filtration.

2) The draft "Tools" document has good, basic facts for the LGU to absorb. To help that process, is the DNR/EQB/other participants planning to proactively travel to LGU meetings to review the document and answer questions?

3) Should there be stronger language acknowledging the moderate risk/high risk Karst areas have for mining damage and environmental contamination?

4) The "Tools" document has many good permit/detailed suggestions for the LGU to regulate the silica sand mining (and good tables for estimated mining company costs for environmental monitoring set up+ ongoing costs). Has there been financial analysis done for
a. current recreational economic dollars created in SE Mn/Driftless area using the natural resources,
b. expenses related to silca mining (regulatory, monitoring, DNR/EQB/other group costs associated costs) vs.
c. overall SE MN area economic gain with silica mining (and no recreational economic economy because of the mining)?
If these things are considered it doesn't seem like silica sand mining would be advantageous to the area.

5) Pages 128-141 covers Trout Stream and Fens. There is also a map included that shows the 1 mile DNR-required stream buffer. When you read these sections (and potential issues), then look at the map, I'm thinking that all of SE MN/Driftless Area should be exempt from silica sand mining condieration.
Or, can there be a "few possible silica sand mining" areas identified by experts (that are guarenteed not to diminish air/water/land environmental quality) and just those areas (with LGU approval) are available for mining? ...just some thoughts

6) pages 159-160 Floodplains. This section adds to #5 exemption areas along with the cultural burial grounds areas.

7) Based on the "Tools" document and the DNR/EQB/other participants expertise, can areas of Minnesota be designated exempt from silica sand mining as the "Best Management Practice"? Or present a strong recommendation of mining exemption to the appropriate LGU and have it approved for enforcement? Sometimes the natural resources/environment needs a strong voice to save citizens from greed.

Thanks for listening.
Sue Ramthun
Rochester Mn

On Mon, Dec 23, 2013 at 3:25 PM, Minnesota Environmental Quality Board wrote:

MN Environmental Quality Board
The EQB has extended the period for public comments on

“Tools to Assist Local Governments in Planning for and Regulating Silica Sand Projects”

In response to requests from various stakeholders for additional time to review the document, **the comment period has been extended to January 27, 2014**
This document was prepared to fulfill the legislative requirement to prepare model standards and criteria for mining, processing, and transporting silica sand. The December 13, 2013 “ *Tools* “ document is a draft. Its release signaled the start of a public comment period.

The document can be viewed and downloaded from:
http://www.eqb.state.mn.us/documents/Tools%20for%20Local%20Govt%20draft%20DECEMBER%2013_2013.pdf
Comments can be submitted via e-mail to: silicasand.eqb@state.mn.us
Comments also can be submitted to: Jeff Smyser, Environmental Quality Board, 520 Lafayette Road North, St. Paul, MN 55155-4194

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