



Outlook

FW: Holcim Larson Quarry EAW

From PublicWorks <PublicWorks@co.washington.mn.us>**Date** Mon 2024-12-09 10:31 AM**To** Daniel Elder <Daniel.Elder@co.washington.mn.us>; Lyssa Leitner <Lyssa.Leitner@co.washington.mn.us>

Scott Molitor | Office Specialist
Washington County Public Works
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6893

To plan, build, and maintain a better Washington County

From: Joe Neumann <jcn7vc@gmail.com>
Sent: Monday, December 9, 2024 10:28 AM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: Holcim Larson Quarry EAW

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

I support this plan to allow expansion of the Larson Quarry. The quarry operation employs residents of Washington County, adds to the tax revenue of the county and city, and ships a majority of products by barge to reduce the number of trucks on local streets and roads, reducing truck traffic and allowing for more efficient shipping of aggregate products. These are all things that are necessary for our community to grow and thrive in the coming years. Preventing this expansion will cause the closure of the operation, speeding up residential development of the area and increasing the traffic to the island.



FW: Written Comment: Grey Cloud Island + Larson Quarry

From PublicWorks <PublicWorks@co.washington.mn.us>

Date Wed 2024-12-11 3:39 PM

To Daniel Elder <Daniel.Elder@co.washington.mn.us>; Lyssa Leitner <Lyssa.Leitner@co.washington.mn.us>

FYI

Scott Molitor | Office Specialist
Washington County Public Works
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6893

To plan, build, and maintain a better Washington County

From: Erick Boustead <erick.boustead@gmail.com>

Sent: Wednesday, December 11, 2024 3:22 PM

To: PublicWorks <PublicWorks@co.washington.mn.us>

Subject: Written Comment: Grey Cloud Island + Larson Quarry

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

Hello,

I believe there should be further environmental study and review before a decision is made re: Larson Quarry seeking to expand operations at Grey Cloud Island.

Grey Cloud island is a site of deep significance for Dakota people. As the Dakota are the first people of this land, their concerns and wishes should be a primary consideration in how to move forward. We must protect Grey Cloud Island for future generations.

Thank you,
Erick Boustead

--

Erick Boustead
c. 612 968 4707

Gender pronouns: Any



FW: Holcim Larson Quarry EAW

From PublicWorks <PublicWorks@co.washington.mn.us>

Date Thu 2024-12-12 7:52 AM

To Daniel Elder <Daniel.Elder@co.washington.mn.us>

Cc Lyssa Leitner <Lyssa.Leitner@co.washington.mn.us>

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: Tim Foster <tim.exteriors@gmail.com>

Sent: Wednesday, December 11, 2024 7:05 PM

To: PublicWorks <PublicWorks@co.washington.mn.us>

Subject: Holcim Larson Quarry EAW

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

I am only writing in fear that our government may let this land be rezoned to be stripped and flooded. Please do not give in to the Swiss corporation. Don't except brides or payouts. This is right in the metro area. They can mine the ample rural areas throughout the state. Please leave this sacred land in tact. Why would this even be considered? What is in it for the township citizens? Who would benefit from this?



FW: Holcim EAW public comment Mohr/Hodge 9301 Grey cloud Island Dr S

From PublicWorks <PublicWorks@co.washington.mn.us>

Date Mon 2025-01-06 8:10 AM

To Daniel Elder <Daniel.Elder@co.washington.mn.us>

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: Jeffrey Mohr <mohr341@gmail.com>

Sent: Sunday, January 5, 2025 12:54 PM

To: PublicWorks <PublicWorks@co.washington.mn.us>; townclerk@greycloudislandtwp-mn.us; Karla Bigham <Karla.Bigham@co.washington.mn.us>; rep.rick.hansen@house.mn.gov

Subject: Holcim EAW public comment Mohr/Hodge 9301 Grey cloud Island Dr S

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

Washington County MN (RGU):

“We stand now where two roads diverge. But unlike the roads in [Robert Frost's](#) familiar poem, they are not equally fair. The road we have long been traveling is deceptively easy, a smooth superhighway on which we progress with great speed, but at its end lies disaster. The other fork of the road — the one less traveled by — offers our last, our only chance to reach a destination that assures the preservation of the earth.”

— Rachel Carson, [Silent Spring](#)

We are writing with comments and concerns about the proposed Larson Quarry mine expansion. After reviewing the EAW, we believe an Environmental Impact Statement is warranted to better understand the permanent negative impact that it will have on our community. Furthermore, significant modifications are in order to curtail this impact.

- First, neither option 1 nor option 2 of road relocation/mining areas are respecting the 500' foot setback from our property line for extraction. We are at 9301 Grey Cloud Island Drive(property north of the expansion area). This needs to be highlighted and corrected.

- The dewatering information is from 2004. This was before the discovery of PFAS in our wells. Does dewatering create a “current” in the aquifer pulling more contaminants to our groundwater?
- The Barr Engineering study from 2004 seems to show a gradual slope to the floor of the pit. This is inaccurate as the intention is a vertical 100’ wall. Does this affect the amount of dewatering that will occur?
- We have seen a sharp reduction in wildlife in recent years due to habitat loss. How will mine expansion and road relocation impact wildlife corridors for our non-human residents? Option 1 seems to eliminate corridors completely with the road right on the bluff line down to Grey Cloud Island Channel.
- How will blasting so close to our homes affect our infrastructure? (Wells, foundations, etc.) Impact to the human environment is important too!
- Dumping of trash (Couches, hazardous waste, construction debris) is a major concern of ours. How will road relocation cause more opportunity for dumpers to furtively pollute our island? If the road is on the bluff next to the channel; they could throw it directly in the river.
- Are we engaging the Prairie Island Band of Ojibwe for their feedback on the permanent unreclaimable destruction of their ancestral home? The archaeological site assessment is weak. We are not swayed by a “negative shovel test”. Are you? There is multidimensional and priceless value to this land for our native population.
- We have spent a small fortune installing a solar array on our roof, a fast charger and 2 EVs which we can charge with our solar to decrease our dependence on fossil fuels. How will increased dust production from mining closer to our home impact the efficiency of our solar and impair our ability to reduce our carbon footprint?
- If allowed to proceed with expansion, can we make the mine extract in a fashion that would allow for a gradual grade down to the future lake so that it can actually be used by future generations? A fifty foot cliff down to a 50’ deep lake seems like a major safety concern eternally.
- Option 1 shows the addition of two 90 degree turns on CR75 to start and end the ring road. Engine braking (which *does* occur all the time) and acceleration of the mine trucks around these turns will cause significant noise pollution.

Holcim repeatedly justifies their presence on the island by the fact that they have been here since 1955. This is seven years before Rachel Carson wrote *Silent Spring*. We humbly ask you to take the ‘road less traveled’ as Carson implores in the quote above. Protect the beauty, biodiversity and cultural importance of this gem. Much like Teddy Roosevelt with the National Parks, or Walter Mondale with the St Croix National Scenic Riverway, YOU have the opportunity to leave your legacy as an ardent steward of this river paradise.

Mining is the pits,

Jeffrey J Mohr and Tanya M Hodge
9301 Grey Cloud Island Dr S

jejmohr@yahoo.com

smilehodge@yahoo.com

Sent from my iPad



FW: Holcim EAW for Grey Cloud Island expansion

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Thu 2025-01-09 2:55 PM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

FYI some more questions

Scott Molitor | Office Specialist
Washington County Public Works
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6893

To plan, build, and maintain a better Washington County

From: Teri OConnor <mnbredtlo@comcast.net>
Sent: Thursday, January 9, 2025 2:54 PM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: Holcim EAW for Grey Cloud Island expansion

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

I have a couple of comments/questions I'd like to make/ask if it's not too late.

1. How can the EAW say that blasting within this expansion is not going to affect anyone/anything outside of the expansion? I live up the hill on the east side of the Grey Cloud Channel and we hear and feel the explosions from the current quarry up there - it will be much worse with the expansion. This does not make sense to me. It will not only be louder and more rattling but it will also disturb migrating and nesting species in the channel. How can the county or state say it won't?

2. I would like to go on record as preferring Option 2 for the roadwork that Holcim is proposing. I think the bridge would be less impactful and keep the island in better shape after the company finally leaves it.

Thank you for allowing me to make these comments and ask my question.

Teri

Teri O'Connor

Grey Cloud Island, MN



FW: Questions about Holcim EAW

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Fri 2025-01-10 6:15 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: bahumlie2@aol.com <bahumlie2@aol.com>
Sent: Thursday, January 9, 2025 6:18 PM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: Questions about Holcim EAW

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

Hello,

A few more questions regarding the EAW.

What will be done with the wood waste created when mature trees are removed? Is it going to be used in a sustainable way in terms of lumber or will it go to Pigs Eye to be mulched and burned?

Are any mitigation being taken for migratory nesting birds in the proposed area? This project may have a negative affect on the hunting opportunities on private residents land and waters edge of the channel.

If work beings and Native American artifacts or remains are found how will that situation be handled?

Ben Humlie
9012 Grey Cloud Trl.
St. Paul Park MN



Outlook

FW: EAW Holcim Public Comment: SAVE WHAT IS LEFT OF GREY CLOUD ISLAND!

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Mon 2025-01-13 8:35 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: Tanya Hodge <tanya.hodge@gmail.com>
Sent: Sunday, January 12, 2025 11:23 AM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Cc: Jeff Mohr <mohr341@gmail.com>
Subject: EAW Holcim Public Comment: SAVE WHAT IS LEFT OF GREY CLOUD ISLAND!

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

Washington County Public Works:

I have lived on Grey Cloud Island for nine years. It is a unique environmental space. My *home* is 9301 Grey Cloud Island Dr. S, St Paul Park, MN 55071. I am immensely grateful to be able to afford a *home* where old oak trees, eagles, and a view of the historic Mississippi River surround me. Grey Cloud Island is the *home* to flora and fauna that make our beautiful state great. It should be protected, not blasted into a massive hole.

I am grateful for this EAW process. I appreciate the time and attention I received at the Public Comment Meeting at our Town Hall. I understand this process has been put in place because of how we have grown to see our devastating impact on the natural environment in our need to expand industry and gain more money. For a metaphoric punch in the stomach image of what I am trying to show through words, I implore you to look at a current overhead view of my *home*, Grey Cloud Island. It is heart-wrenching how much of the island is gone. Please, help me save what is left of *home*.

This is my second "Public Comment." I will work to not repeat what my spouse, Jeff Mohr, and I detailed in our previously co-written "Public Comment" email. (I understand that this is more

pathos than logos, but it is hard for me to separate my emotional connection. I understand that this may not be germane to this process, but my exigence is overwhelming.)

Dewatering and the Discharge of Per- and poly-fluoroalkyl substances (PFAS):

Holcim's plan to increase, as stated in the EAW, the dewatering and discharge of untreated PFAS water into Pool 2 of the Mississippi River could have devastating environmental impacts beyond the state of Minnesota. The questions: Are there PFAS present in Holcim's test wells? They should be tested, and the test results should be made public. Furthermore, if PFAS are present, does this bring about a clear and present danger to the Mississippi River? Holcim may need to fill up the pit with the contaminated water to keep it where it is so that it does not become a conduit for the extensive spreading of PFAS-contaminated water.

Pool 2 is already contaminated. The fact that PFAS is present does not undermine the importance of PFAS concentration.

With an EIS, could stakeholders, including the Minnesota Pollution Control Agency, EPA, Friends of the Mississippi, and South Washington County Watershed District, provide comments, research, and expertise on the environmental impact of the increased discharge of PFAS into the Mississippi River?

I appreciate you,
Tanya Hodge
612.636.0659



January 10, 2025

Daniel Elder, Zoning Administrator
Washington County
11660 Myeron Road North
Stillwater, MN 55082

RE: Grey Cloud Island Twp. – Environmental Assessment Worksheet (EAW) – Larson Quarry Expansion
Metropolitan Council Review No. 23032-1
Metropolitan Council District No. 12

Dear Daniel Elder:

The Metropolitan Council received the EAW for the Larson Quarry Expansion project in Grey Cloud Island Twp. on December 3, 2024. The proposed project is located east of County Road 75. The proposed development consists of 148 acres.

The staff review finds that the EAW is complete and accurate with respect to regional concerns and does not raise major issues of consistency with Council policies. An EIS is not necessary for regional purposes.

We offer the following comments for your consideration.

Item #7- Climate (*Mackenzie Young-Walters, 651-602-1373*)

The discussion of climate trends and proposed mitigation measures are adequate given the limited impact that the identified climate trends will have on mining operations. However, the “Use of native vegetation in reclamation of upland areas” adaptation listed under Land Use in 7.b should also be listed as an adaptation under Project Design as it helps offset the identified impact of “Warmer temperatures may create more difficulty in establishing vegetation during reclamation” from that section. Metropolitan Council staff would also encourage the project proposer to identify opportunities for tree replacement as part of the reclamation of upland areas to mitigating the significant tree loss associated with the project.

Item #10- Land Use (*Emma Dvorak, 651-602-1399*)

The EAW accurately states that the Reclamation Plan is subject to the ongoing regulatory authority of Grey Cloud Island Township and Washington County and the standards contained within their land use ordinances and is subject to a reclamation bond. The plan should also indicate that the future land use of the expansion site after reclamation is medium-density, rural residential development.

This concludes the Council's review of the EAW. The Council will not take formal action on the EAW. If you have any questions or need further information, please contact Emma Dvorak, Principal Reviewer, at 651-602-1399 or via email at emma.dvorak@metc.state.mn.us.

Sincerely,

ERIC WOJCIK for



Angela R. Torres, AICP, Senior Manager
Local Planning Assistance

CC: Tod Sherman, Development Reviews Coordinator, MnDOT - Metro Division
Susan Vento, Metropolitan Council District 12
Emma Dvorak, Sector Representative/Principal Reviewer
Reviews Coordinator

N:\CommDev\LPA\Communities\Grey Cloud Island Township\Letters\Grey Cloud Island Twp 2024 Larson Quarry Expansion EAW Complete with Comments 23032-1.docx

January 7, 2025

Daniel Elder
Washington County
11660 Myeron Road North
Stillwater, Minnesota 55082
daniel.elder@co.washington.mn.us

RE: Larson Quarry Expansion – Environmental Assessment/Environmental Assessment Worksheet

Dear Daniel Elder:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Larson Quarry Expansion project (Project) located in Washington County, Minnesota. The Project consists of Holcim-MWR, Inc. proposing to expand their existing limestone quarry, known as the Larson Quarry, to the east onto an adjacent 148-acre property that they own located east of County Road 75. The Larson Quarry and expansion area is in Grey Cloud Island Township, Washington County, Minnesota. No change in quarry operations or production levels is proposed. The expansion will extend the life of the mine by 20-25 years. The Minnesota Pollution Control Agency (MPCA) staff has reviewed the EAW and have no comments at this time.

We appreciate the opportunity to review this project. **Please provide the 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 actions 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, please contact me by email at chris.green@state.mn.us or by telephone at 507-476-4258.

Sincerely,

Chris Green

This document has been electronically signed.

Chris Green, Project Manager
Environmental Review Unit
Resource Management and Assistance Division

CG:rs

Attachments

cc: Dan Card, MPCA (w/ attachment)
Miranda Nichols, MPCA (w/ attachment)
Nicole Peterson, MPCA (w/ attachment)
Deepa deAlwis, MPCA (w/ attachment)
Innocent Eyoh, MPCA (w/ attachment)
Lauren Dickerson, MPCA (w/ attachment)

GREY CLOUD ISLAND TOWNSHIP

COUNTY OF WASHINGTON
STATE OF MINNESOTA

RESOLUTION 2022-04

A Resolution Denying Setback Variance for Aggregate Industries – Larson Quarry

WHEREAS, Aggregate Industries has requested approval of a variance from Grey Cloud Township Ordinance No. 49 Zoning Section V.A.1 Subsections a. and d. to allow mining within 500 feet of adjoining property lines and County Road 75 at the north end of their Larson Quarry; and,

WHEREAS, the Planning Commission of Grey Cloud Island Township heard Aggregate Industries request on December 6, 2021; and,

WHEREAS, the Town Board of Grey Cloud Island Township has reviewed said variance at a duly called public hearing on January 19, 2022 which was continued to March 9, 2022, which was continue to March 29, 2022.

NOW, THEREFORE, BASED UPON ALL THE FILES, RECORDS AND HEARINGS HEREIN, BE IT HEREBY RESOLVED BY THE TOWN BOARD OF GREY CLOUD ISLAND TOWNSHIP, MINNESOTA, that it should and hereby does deny the variance for Aggregate Industries to allow mining within the 500 foot setback at the north end of the Larson Quarry as indicated in the Variance Request Depiction Map submitted by Aggregate Industries with the variance application, with the following findings:

Aggregate Industries is basing their request on the assumption that the two private agreements mentioned in their request:

- Are valid
- Supersede the town board's regulatory authority

The town board disagrees that both agreements are valid as the Mohr/Hodge property at 9301 Grey Cloud Island Drive South is not, and never has been, in the CE district. The zoning ordinance in affect at the time (Nov. 30, 1992) specified that "An owner of property within the CE District" could enter into written agreements. The town board also disagrees that these documents supersede their authority to apply variance testing criteria as defined by Minn. State Stat. §394.27 Subd. 7 as reasonableness, uniqueness, and essential character.

Grey Cloud Island Town Ordinance No. 49 Zoning Section V.A.1 specifies that no mining, stockpiling, or land disturbance shall take place within 500 feet of adjoining property lines. The town board believes the intent of this setback is to protect residents' homes from damage caused by blasting, from the copious amounts of dust produced by mining, from commercial noise, and from water quality or quantity issues. Allowing this variance would subject residential properties and owners to these concerns. Therefore, granting of this variance would not be in harmony with the general purposes and intent of the zoning ordinance.

Aggregate Industries owns almost 600 acres of land in the Township of Grey Cloud Island. The

9910 Grey Cloud Island Drive S.

PO Box 4. St. Paul Park. Minnesota 55071

651-459-6236

Email: townclerk@greycloudislandtwp-mn.us

area in question is not in any way unique in comparison.

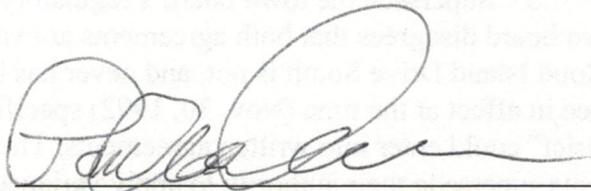
Grey Cloud Island Township is a very small (283 residents, 112 households, 4 miles of roads), semi-rural community. People live here for its rural attributes; e.g. heavily wooded, larger lot sizes, etc. When mining has occurred closer than 500 feet, the physical characteristics of the area have changed. Where there once were trees, there is now a berm. Where you once could watch the sun set, you now have a berm. Allowing mining within the 500 foot setback does alter the essential character of the locality in the foregoing and following ways:

- Removal of trees nearer to homeowner properties alters the view of local residents.
- All mining activities include, but are not limited to, drilling, blasting, vibrations, noise, dust, trucking, crushing of material, dewatering, vegetation clearing, material storage, large equipment operation, building of berms, etc. The closer these activities are to homes, the greater the effect on the essential character of the locality.
- Blasting nearer to residential properties can cause damage to homes. That is why Aggregate Industries is offering to do property inspections. In the last few years, homeowners 4300 feet away from the quarry have been known to complain about blasting as it rattles their homes and its contents.

The proposed use is not considered reasonable due to the severity of the request. The applicant is not asking to mine twenty (20) feet closer or thirty (30) feet closer but more than half of the setback distance defined in the local ordinance.

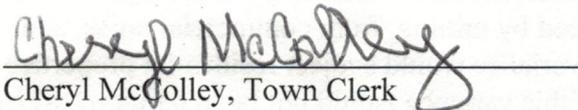
Note: The variance application submitted by Aggregate Industries includes a 'Variance Request Depiction Map'. The map includes land on the east side of CR75, which the applicant owns, and which is currently zoned Rural Residential. The applicant indicates on the map that this area is slated for mining in 2025. Future mining in this area is not germane to this variance request and is in no way approved by granting or denying this variance.

ADOPTED by the Town Board of Supervisors of Grey Cloud Island Township this 29th day of March 2022.



Chairman
Grey Cloud Island Town Board of Supervisors

ATTEST:



Cheryl McCollery, Town Clerk

The town board agrees that the 1985 Settlement Agreement does not compel the board to approve AI's variance request to mine within 500 feet of the Ries and Mohr properties.

MODIFICATION AGREEMENT

This Agreement made this 30 day of November, 1992, between and Dennis L. Hanna and Elizabeth K. Hanna, 9301 Grey Cloud Island Drive, St. Paul Park, Minnesota 55071 (hereinafter collectively "HANNA") as owners of the three parcels of land located in Washington County, Minnesota, more particularly described on Exhibit A, and

Shiely Company, formerly J. L. Shiely Company, 2915 Waters Road, Suite 105, Eagan, Minnesota 55121 (hereinafter "SHIELY") as owner of property described on Exhibit B.

WITNESSETH:

By Deed dated September 21, 1987, recorded December 8, 1987, as Document No. 558462 in the Office of the Washington County Recorder, and by Deed October 15, 1987, recorded November 16, 1987, as Document No. 556607, and by Deed dated December 18, 1990, HANNA acquired from SHIELY three parcels of property in Washington County, Minnesota more particularly described on Exhibit A attached to this Modification Agreement and made a part hereof (the "HANNA PROPERTY"), which parcels were subjected to various covenants, conditions and restrictions noted in the Deeds;

The parties have agreed to substantially modify the covenants, conditions and restrictions on the HANNA PROPERTY, and to make them uniform so that all of the HANNA PROPERTY shall be held by HANNA subject only to the following easements and covenants in favor of SHIELY.

NOW, THEREFORE:

1. For valuable consideration, receipt of which is acknowledged by both HANNA and SHIELY, HANNA hereby conveys and quitclaims to SHIELY the following interests in the HANNA PROPERTY for the benefit of SHIELY and its successors and assigns as owners of the property in Exhibit B, and any additional property hereinafter acquired in the City of Cottage Grove or in Grey Cloud Township which enlarges the property described on Exhibit B (all of said property now or hereafter owned by SHIELY is collectively called "SHIELY PROPERTY").

2. HANNA hereby waives all rights to setbacks that apply to mining operations that affect the HANNA PROPERTY. Further, HANNA agrees that the HANNA PROPERTY shall be included in the calculation of setbacks as required by regulation, and HANNA authorizes SHIELY to conduct its mining operations as close to the HANNA PROPERTY as SHIELY, in its sole discretion, deems safe.

3. HANNA hereby grants a perpetual easement over the HANNA PROPERTY for the present and future use and benefit of the SHIELY PROPERTY for the purpose of mining, drilling, blasting, crushing, screening, processing, transporting and marketing sand, gravel, rock, rock materials and aggregates on SHIELY PROPERTY. Such use shall include operations which may result in vibration, noise, dust and air conditions on the HANNA PROPERTY normally associated with mining operations.

4. HANNA releases SHIELY from any and all liability for any damages relating to any mining activities conducted in Grey Cloud Township in Washington County, Minnesota.

5. HANNA relinquishes any rights or benefits which may arise under any federal, state, county or local statutes, ordinances, rules or regulations relating to setbacks or the operation of mining companies.

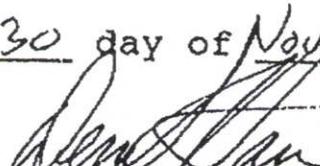
6. The easements and covenants herein shall bind the heirs and assigns of HANNA as owners of the HANNA PROPERTY and shall benefit SHIELY and its successors and assigns as owners of the SHIELY PROPERTY. The easements and covenants and restrictions established by this Modification Agreement shall run with the land and be deemed appurtenant to the respective properties.

7. Notices may be given by each party to the other at the address first stated above, or at such other address as either party may provide to the other from time to time. Notices shall be given by registered or certified mail, postage prepaid.

8. Except for the easements and covenants set forth above in this Modification Agreement, SHIELY releases and quit claims to HANNA all of its right, title and interest in the HANNA PROPERTY.

IN WITNESS WHEREOF, the parties have set their hands this

30 day of November, 1992.

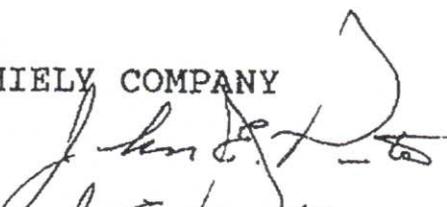


Dennis L. Hanna



Elizabeth K. Hanna

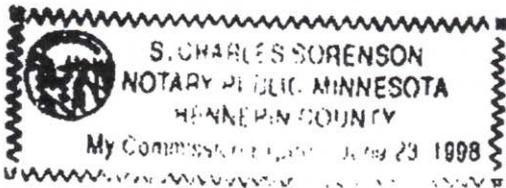
SHIELY COMPANY


BY J. E. T. to
Its V.P. / Treasurer

STATE OF MINNESOTA)
) ss.

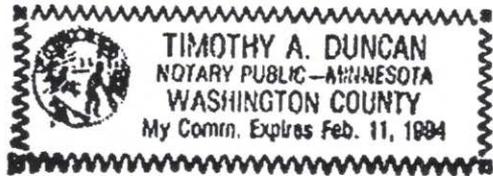
COUNTY OF Hennepin)

The foregoing instrument was acknowledged before me this 3rd
day of December, 1992, by Dennis L. Hanna* and Elizabeth K.
Hanna* individuals. * married



[Signature]
Notary Public

STATE OF MINNESOTA)
) ss.
COUNTY OF Dakota)



The foregoing instrument was acknowledged before me this 24th
day of November, 1992, by John E. Porter, the
V.P. of Shiely Company, a Minnesota corporation.

[Signature]
Notary Public

This instrument was drafted by:

OPPENHEIMER WOLFF & DONNELLY
1700 First Bank Building
Saint Paul Minnesota 55101



FW: In follow up of previous comments Mohr Hodge 9301 grey Cloud Island drive

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Mon 2025-01-13 8:25 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

 3 attachments (3 MB)
CE overlay 2.pdf; CE overlay 3.pdf; CE overlay.pdf;

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: Jeffrey Mohr <mohr341@gmail.com>
Sent: Sunday, January 12, 2025 10:05 AM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Cc: Tanya Hodge <tanya.hodge@gmail.com>; jejmohr@yahoo.com
Subject: In follow up of previous comments Mohr Hodge 9301 grey Cloud Island drive

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

Sent from my iPad

First of all, thank you for holding the public hearing at Town Hall the other day. It was very informative and nice to meet you in person. I wanted to submit these documents for your future reference.

One of my concerns from my previous comments was the mining boundary on the map of the EAW not respecting the 500' setback from my property line. My assumption is that the mine will say that they have a covenant on my property. This is true. However, the covenant is not and has never been legal.

Ordinance 36 from 1985 (Which was repealed by ord. 49) states " An owner of property within the **CE district**, other than the applicant, may enter a written agreement with the applicant in

recordable form to authorize mining within 500' of such owners property. Such authorization shall not be valid unless the written agreement is in fact recorded.”

The key thing here is that my property is not in the CE District and never has been. This agreement has not been enforceable since the date of its inception. For reference, the CE District boundary is the land east of CR 75 to the river. My property is entirely west of CR75 not in the CE district which is shaded above. Holcim has agreed at a previous hearing that my property is not in the CE.

The town board has already ruled that the covenant on my property is not valid. I have attached both the covenant and the 2022 Town Board resolution on a previous variance request and validity of the covenant.

Please add these pieces of information to my previous comments about the proposed mining boundary line on the north portion of the EAW.

I have learned the importance of the location of lines on a map through dealing with Holcim. Please make them modify the mining boundary line on the EAW map to respect the 500' setback from my property line.

Thank you,

Jeffrey Mohr & Tanya Hodge
9301 Grey Cloud Island Dr S

Date: January 9, 2025

To: Washington County Public Works Department

CC: Grey Cloud Island Township Board of Supervisors

From: Jane Speech

Re: EAW from Holcim for Proposed Mining Expansion

I wish to submit comments and questions about the EAW from Holcim for proposed expanded mining on Grey Cloud Island. They pertain to transportation of aggregate products, groundwater drawdown, blasting, road alignment options, reclamation and future land use, plus a map question. Thank you.

A handwritten signature in black ink, appearing to read "Jane Speech", written in a cursive style.

Jane Speech

5585 99th Street South

Grey Cloud Island, MN

Page 4 EAW-Holcim

Operations Overview

The limestone is currently being quarried in two separate cuts or benches within the active mining area. The upper bench, about 50 feet thick, is typically removed first followed by extraction of the lower bench, also about 50 feet. Once material is blasted and extracted, it is transported via a conveyor system to the processing plant where it is crushed, screened and/or washed. Processed materials are loaded onto barges or trucks for transportation to their destination. The majority of the processed material is currently and will continue to be transported via barge up the Mississippi River to the company's distribution yard in St. Paul. Some material will also be trucked out on CR 75, depending upon the demand of local projects.

Comment/Question: Define "majority" more specifically. Before Minneapolis closed a riverside yard, 90% or more of the Larson material was moved by barge. Did the percentage change? Has that translated into more truck traffic on CR 75? Maximizing barge transfer and minimizing truck traffic result in better conditions for local residents.

Page 4 EAW-Holcim

Mining Methods

The expansion area will be mined utilizing the same methods used at the existing Larson Quarry. The quarry is dewatered, which lowers the groundwater table within the limestone deposit to allow removal of the limestone using dry mining methods. Trees are removed in phases as areas are prepared for mining. Topsoil and overburden are removed and used to create screening berms and safety berms. The berms are seeded

Comment/Question: Effects of dewatering must be closely monitored, and measures to mitigate or repair adverse effects on residents' wells must be enforced. Are procedures in place to help residents pursue complaints without undue bureaucratic entanglement?

Page 5 EAW-Holcim and Page 73

Seismographs are placed between the blasting area and the closest structures to record ground vibration and sound pressure levels from each blast to verify that safe limits established by the US Bureau of Mines are not exceeded as well as to provide data for the blast contractor to use in the analysis and design of subsequent blasts.

Monitoring, Reporting, and Compliance: There are four permanent seismographs strategically placed around the existing Larson Quarry that monitor both air overpressure and peak particle velocity for each blast. In addition, a portable seismograph is placed at the nearest residence to ensure blasting standards are not exceeded at the nearest structure to any given blast. Holcim has an independent third-party design, conduct, monitor, and submit reports to the Township monthly. All blasting records show that federal and state blasting regulations and rules are consistently being met.

Comment/Question: Explosives provide a valuable tool for mining, and blasts can be well designed. Larson Quarry seismographic data indicate regulatory compliance. Our responsibility as residents of Grey Cloud Island is to ensure remedial measures are in place if blasts have unexpected deleterious effects.

Page 5 EAW-Holcim

Expansion Area

CR 75 runs north-south between the existing quarry and the proposed expansion area, creating a physical barrier between the properties. In order to access the eastern limestone reserves and provide for material transport between the expansion area and the existing processing facility, Holcim is considering two options to access the eastern reserves: 1) Realignment of CR 75 and 2) Bridge on CR 75 with underpass through CR 75 right of way on quarry floor. Both options are described in detail in the paragraphs below and are further analyzed in this EAW.

Much of the construction of the new alignment can be accomplished without disrupting typical CR 75 traffic patterns. Construction to connect the north and south end sections of the newly aligned road could take several days up to several weeks.

Comment/Question:

If Option 1 is undertaken, how long would construction take? Final hookup is estimated at days or weeks, but how long would it take to prepare and build about 6000 feet (1.14 miles) of county road suitable for heavy trucks? Would cleared trees be burned, chipped, salvaged for firewood or taken off the island? How much truck traffic would be added for hauling aggregate materials from the Larson Quarry (or the Nelson Plant) to the roadbed?

Page 9 EAW-Holcim

Option 1 CR 75 Realignment

Description	Number
Total Project Acreage	148
Linear project length	+/- 6,000 new roadway
Number and type of residential units	Not applicable
Residential building area (in square feet)	Not applicable
Commercial building area (in square feet)	Not applicable
Industrial building area (in square feet)	Not applicable
Institutional building area (in square feet)	Not Applicable
Other uses – specify (in acres) Quarry Extraction Area	70 acres
Structure height(s)	Not Applicable

Option 2 Bridge/Underpass

Description	Number
Total Project Acreage	148 acres
Linear project length	+/- 100 new bridge
Number and type of residential units	Not applicable
Residential building area (in square feet)	Not applicable
Commercial building area (in square feet)	Not applicable
Industrial building area (in square feet)	Not applicable
Institutional building area (in square feet)	Not applicable
Other uses – specify (in acres) Quarry Extraction Area	53 acres
Structure height(s)	Not applicable

Comment/Question:

In its current configuration, CR 75 is about 1.1 to 1.2 miles long from the Larson Quarry driveway to the culvert/bridge. A road around the expanded pit would be about 1.14 miles long. With a realignment, perhaps 0.1 or so miles of the current CR 75 would be eliminated. That still leaves an extra mile of road to be traversed, not only by residents and extra traffic from outside development (such as Mississippi Dunes), but by gravel trucks hauling from the Larson Quarry. Having trucks exit the island as quickly as possible is preferred. It's also preferable for safety to have a straight course instead of one with multiple curves.

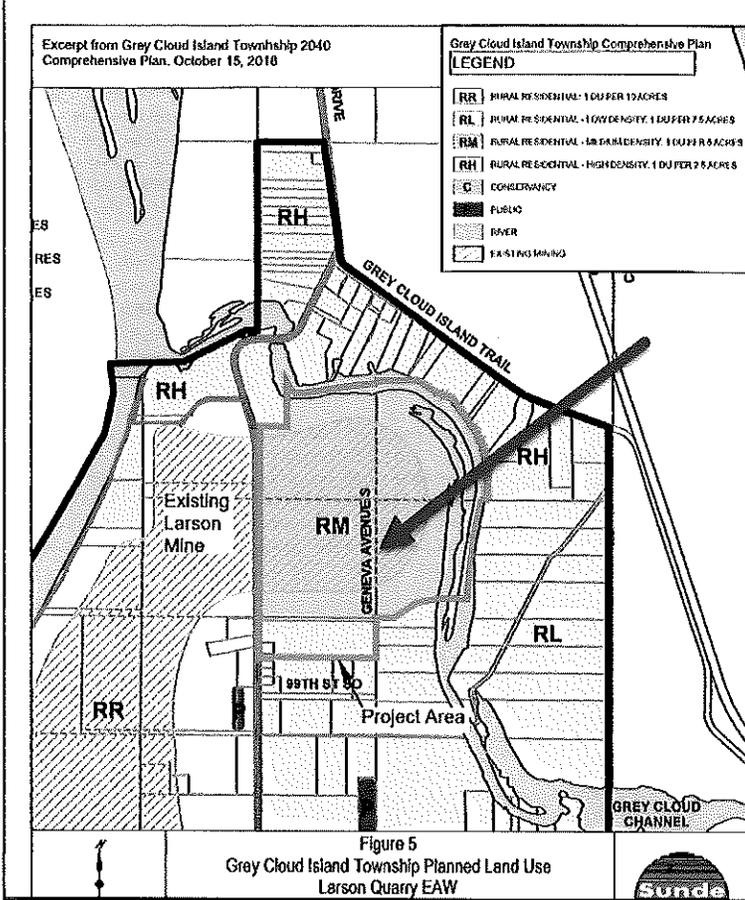
Page 8 EAW-Holcim

Reclamation

Reclamation of the Larson Quarry will be performed upon conclusion of mining activity. The intent of reclamation is to leave the site in a stable condition, minimize the potential for erosion, and establish site conditions that allow for future development of the land. Plan Sheets C3.1 and C3.2 illustrate the reclamation condition of the existing quarry and expansion area and include information on the approximate site elevations upon completion of reclamation grading. The Reclamation Plan is subject to the ongoing regulatory

Comment/Question: When mining is done and dewatering ended, Grey Cloud Island will have new lakes furnished mainly with high quality water discharged from the Prairie du Chien/Jordan rock formations. It is in everyone's best interest – including Holcim, since they'll still own the perimeter land – to maximize post-mining development options. Waterfront land is expected to remain very desirable. Highest and best use of the land could be achieved more easily without the limitations of a truck route through it.

Figure 5
 Grey Cloud Island Township Planned Land Use
 Larson Quarry EAW



Comment/Question: Isn't Geneva Avenue South on the east side of Grey Cloud Channel?

Pages 149 and 150 - EAW-Holcim Attachments

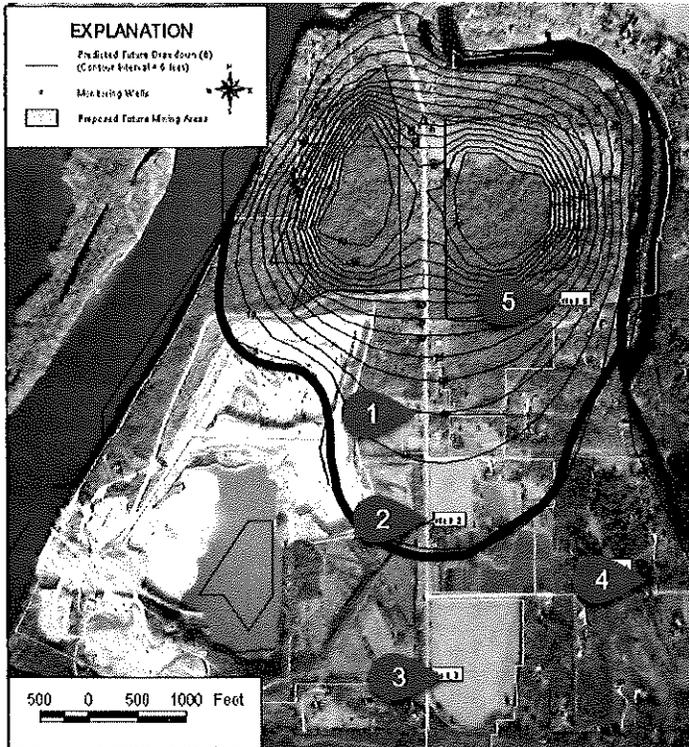


Figure 1

Model Prediction of Future Drawdown (feet) of Water Table (with continued dewatering of existing quarries)

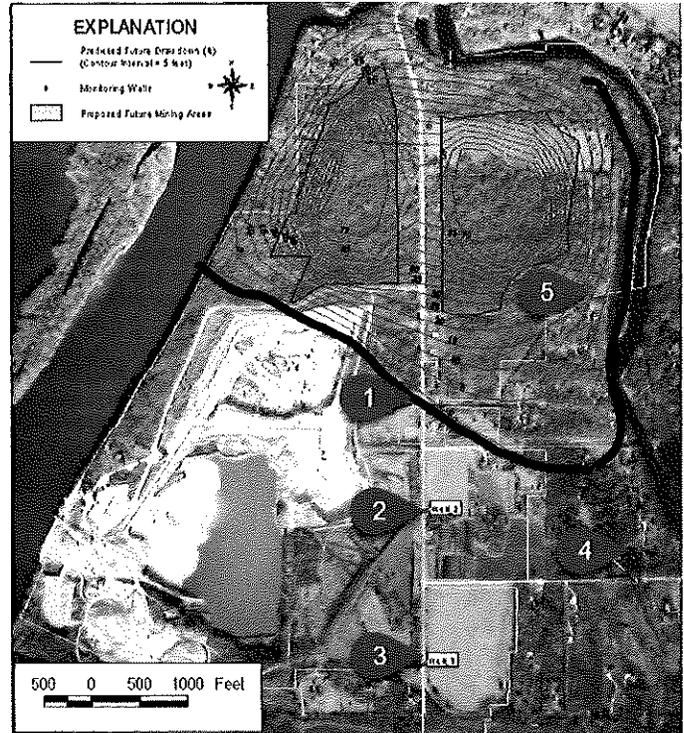


Figure 2

Model Prediction of Future Drawdown (feet) of Water Table (with existing quarries reclaimed as lakes)

Comment/Question:

In 2004 Barr Engineering developed Groundwater Flow Model Simulations. The difference between models for (a) continued dewatering of existing quarries and (b) ceasing dewatering in existing quarries indicates less drawdown if pumping ceases in the existing quarries. The latter scenario seems better for Grey Cloud residents.

Page 152 EAW-Holcim Attachments

Table 1. Simulated water table drawdown

Monitoring Well	Simulate Drawdown Scenario 1 (ft)	Simulated Drawdown Scenario 2 (ft)
MW-1	15.6	-1.9 (rebound)
MW-2	6.2	-12.7 (rebound)
MW-3	1.4	-7.7 (rebound)
MW-4	1.5	-1.0 (rebound)
MW-5	24.2	21.4

Scenario 1: All quarry pits dewatered

Scenario 2: Northern expansion area dewatered and southern quarry area reclaimed as lakes

Note: negative values indicate water levels rise, primarily because dewatering in the southern quarry area would cease.

Comment/Question:

In 2018, Barr updated the simulations. Results reinforce the case for ceasing dewatering of the existing quarries, with dewatering confined to the proposed expansion area.

01-09-2025

The proposal for a variance to mine the Larson pit to jump the road at Co. Rd 75 is just plain wrong and not well thought out by Helcim. The only thing this non-American company wants is the money from the mine. They can't give a rat's ass about the environment pollution it will cause or the hardships on the residents.

Environment? They will be taking away predominantly habitat for deer, fox, numerous small animals, eagles, hawks, other birds, bees + insects, pollution: the dust from blasting, crushing, trucking + loading will pollute the air + waterways. This mine is between the Mississippi River and Pool 2 backwaters. The run off from dirt, oil, diesel and blasting waste will go into these waterways also. The wells that are already

(2) 26 (3)

affected will likely dry up. The wells not affected yet are likely to become compromised. Politicians won't even admit to these wells already affected - what do you think they will do when others are?

Assistant Handshis: wells are just one of the issues affecting residents. In addition to dust, truck traffic, messed up roads, tearing up rear brand new roads, noise and light pollution, - there is the fact that far from mining will devalue the resident's property. In most cases all cases - trade homes are the major investment and only 'nest egg' they have. Many of us devalued most are at risk to being homeless in retirement. It is not right - we have a foreign company come onto our land, reap it, leave a 300 foot deep hole and essentially abandon the area

when it's done being mined.

Another aspect that is ludicrous is mining with

in one foot of a house or structure. This is dangerous.

Do NOT let this happen. Not one person on helping's board

would want that near their house - but they force it on us?

I can't understand why the MN DNR, MN PCA, Federal

PCA, Fed EPA have not got involved in this. Do they

approve or just not know?? They tried to contact all of them.

When the scathing denial Helms got from the federal gov't a few

days back - denial to mine the

Mississippi. What was the proposal should also follow suit.

NO MORE MINING ON GREEN ISLAND...

Sincerely, ~~John M. Utecht~~

John M. Utecht
651-245-0838
69413 Grey Cloud Island Dr.,
St. Paul Park, MN 55071



Holcim EAW

Comment Card

Washington
County
PUBLIC WORKS

January 9, 2025

Contact Information

Name: Tracy C. Moe

Address: 5590 99th St S.

Email: tracymoe123@gmail.com

Phone Number: 612-598-9250

Comment

I had sent a text to Patti from Holcim that I had an easement along the driveway from Cty Rd. 75 to the Christianson property abutting the Greg Cloud Slough and the ends of the property of owner between my property and the Christianson property. No response was ever received.

I want to know if there are plans to keep or eliminate the driveway as others also have an easement for access and egress on the driveway. It's a 33 ft. wide easement and recorded at Washington County.



Outlook

Holcim EAW Comments

From Carol Shetka <clshetka45@q.com>

Date Tue 2025-01-14 2:13 PM

To PublicWorks <PublicWorks@co.washington.mn.us>

Cc Daniel Elder <Daniel.Elder@washingtoncountymn.gov>; townclerk@greycloudislandtwp-mn.us <townclerk@greycloudislandtwp-mn.us>; Karla Bigham <Karla.Bigham@washingtoncountymn.gov>; Tina Elam <Tina.Elam@washingtoncountymn.gov>

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

Holcim Larson Quarry Expansion EAW Comments:

Alternate 1

The December 2022 EAW version shows CR.75 relocated with gentle curves (inset 6-1 of operations plan January 1971). C2.1 of this EAW shows the relocation with two 90 degree connections to C.R.75. The stated AADT in the EAW is 1,550 which includes a good number of gravel semi's/trucks. To replace a major collector straight stretch of roadway with one 3,500 feet longer with curves and 90 degree turns is ludicrous and flies in the face of traffic engineering common sense.

The following comments are based on a road relocation with a design speed of 40 mph including curves:

The net length increase is 3,500 feet and with an ADT of 1,500 would result in 994 addition miles/day, 363,000 miles/year and at a fuel average of 30 miles/gal would be 12,000 gallons of fuel.

The travel time would increase to 1 minute 20 seconds which on the face may not seem excessive but in an emergency for police, fire and ambulance every second is critical and would be greatly increased if the EAW "design" were adopted

The EAW states Holcim would be responsible for construction and maintenance and that C.R.75 would likely lose designation. If the Township would be the R.O.W. owners how would this be administered? Perhaps an endowment/escrow established/funded by Holcim to reimburse costs.

Additionally how would power lines [et.al.](#) be handled?

Alternate 2

It's stated the excavation and bridge construction would take 3 to 5 years and a detour would be in place. Assume this is because excavation would be only during summer operation. Why not require excavation and stockpile of material year round to considerably shorten the timeline?

If winter excavation is not feasible first construct earth ramps to raise the roadway and bridge to an elevation to accommodate future excavation under the bridge. The ramps and bridge could hopefully be build in one season.

As with alternate 1 who is responsible for construction and on going maintenance of the bridge?

Has an alternate for a conveyor/bridge system over the existing road been explored compared to the construction/maintenance costs and the disruption/inconvenience both temporary and permanent to the Township for alternates 1 and 2?

Additional questions

After mining is complete are there any plans on how to safeguard the 40 foot bluff and 60 foot deep water that will result (a very attractive hazard)?

What is the anticipated start time for alternate 1?

What is the anticipated start time for alternate 2?

Submitted by:

Allen Shetka (a 54 year resident)

10767 Grey Cloud Island Dr.

Grey Cloud Township



Outlook

FW: Holcim Larson Quarry Expansion - Public Comment

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Wed 2025-01-15 8:21 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: Ashley Ruka <ashley.ruka1249@gmail.com>
Sent: Monday, January 13, 2025 8:52 PM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: Holcim Larson Quarry Expansion - Public Comment

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

January 13, 2025

To Whom It May Concern:

My name is Ashley Ruka and I am writing to address the proposed Holcim Larson Quarry Expansion. My address is 5440 99th Street South on the Island. I live in this home with my two teenage boys, ages 13 and 16. WE LOVE OUR HOME and I would like to express why we love our home and what the elements of this expansion project would mean to us.

WE LOVE OUR HOME because of the wildlife that we coexist with. This is by and large the most important reason we love our two acres on Grey Cloud Island. We moved here to live amongst the deer, the opossums, the rabbits, the coyotes, the countless beautiful birds, the raccoons, the bats, the fireflies, the bees, the butterflies... I can go on. This expansion project will directly impact what we love so very much. As mentioned many times within the EAW, wildlife will move out as phases of the mining project occur. And because the very composition of the land and space will be different and gone, there is not a habitat for them to return to. The EAW mentioned the return of wildlife after reclamation in 25 years. But the wildlife that will leave is not what will return. A deep lake is not the correct habitat for a beautiful, 6-point buck! The EAW also points out the conversation value of the proposed expansion area. I ask that Washington County contribute to those conservation efforts rather than work against them.

WE LOVE OUR HOME because of the beautiful trees and forest. The loss of trees is catastrophic for this project. Both in the mining and in the construction or rerouting of CR-75. The EAW makes notes of up to 75 acres of cleared vegetation and topsoil. It mentions a 70% reduction in trees if Option 1 moves forward and a 40% reduction in Option 2. This reduction in tree cover directly impacts the wildlife that exist on Grey Cloud and the residents that live here. Furthermore, there is no plan in the EAW to replant trees. Because there will be no place for them to grow. Page 28 of the report notes “[there is not a significant] loss of unique forest resource” but I contend that while our trees may not be “unique” it is still a *loss* of forest! And a loss that will not be recovered.

WE LOVE OUR HOME because of the quiet. The only traffic on 99th Street South is our own and that of our neighbors. Is it not a pass through, but a cul de sac. In one conceptual drawing I have seen, Option 1 of the CR-75 proposals brings this road down our street. However, the materials presented at the public comment meeting show the road would run along the backside of our property. The first scenario would be absolutely devastating to my boys and I to live on a road with an AADT of 1550 passes a day including countless semi-trucks loaded with aggregate. This is not why we chose to live where we do. We chose to live where we do to get away from that sort of bustle and noise.

I respectfully ask that you weigh the true economic impact that mining these additional 70 acres will actually produce to the loss of one of the most beautiful places in the county! I AM ENTIRELY AGAINST THIS EXPANSION AND FIND IT UNNECESSARY. I don't believe Holcim is in such a desperate place to need to mine these additional acres to maintain their business. And I have a hard time believing there are noPub other MN regions or mining operations that could fulfill any perceived and forecasted aggregate need.

IF the project moves ahead with all of the necessary variances, permits, and permissions, I would like it noted that my preference for CR-75 is OPTION 2. I would also like it noted that upon my boys' graduation from Park High School, we will move away from this place we love so much.

Please allow Grey Cloud to remain the beautiful gem that it is. Set a standard for balance between the Holcim Corporation and township/residents' desires. There need not be a monopoly. We have coexisted to date; albeit, with some rough spots. But they are already looking to expand mining into the Northern Reserves and with this additional parcel, there just won't be much left.

Thank you for your time and consideration.

Sincerely,
Ashley Ruka
6513293032



Outlook

FW: Larson Mine Public Comment

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Wed 2025-01-15 8:48 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: Jenni Lubke <jalubke@gmail.com>
Sent: Tuesday, January 14, 2025 1:35 PM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: Larson Mine Public Comment

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

Dear Washington County,

I am writing to you regarding the Larson Mine Project. I am a resident of River Acres, and have lived here for 2 years now. I chose to live here because of the tranquility, after having spent over a decade in downtown Chicago. I work from home with a view of Mooers lake outside my office window. Our house is on a well. I am concerned about the project releasing more PFAS into our environment.

My husband and I frequently kayak and fish around grey cloud island multiple days a week in the summertime.

There are impacts to the biodiversity of the area. This directly affects my enjoyment of the migratory birds and aquatic species I am able to observe from my home on the river's edge. Alternatives should be seriously considered to protect the wildlife near our homes, and near Gray cloud SNA - a very important RSEA that is extremely close to this proposed site.

Cottage Grove should be trying to attract sustainable businesses that do not impact our natural world in a negative way. We have an amazing section of the Mississippi River to keep clean and preserve for future generations. We should not be clearing trees from the island.

Cottage Grove should be trying to attract residents who care about the land. I believe that the mine expansion will decrease the desirability to live in Cottage Grove, and specifically in River

Acres and grey cloud island neighborhoods.

If you have any questions about my comments, please email me back.

--

Jenni Lubke (she/her)
jalubke@gmail.com

INTERNATIONAL UNION OF OPERATING ENGINEERS

LOCAL No. 49, 49A, 49B, 49C, 49D, 49E, 49L
MINNESOTA • NORTH DAKOTA • SOUTH DAKOTA

EUGENE J. GROVER, President
MARK J. POTHEN, Vice President
STEVE R. PIPER, Recording-Corresponding Secretary
MARVIN J. HOSE, Treasurer



RYAN P. DAVIES
Business Manager/
Financial Secretary

2829 Anthony Lane South, Minneapolis, MN 55418-3285
Phone (612) 788-9441 • Toll Free (866) 788-9441 • Fax (612) 788-1936

January 15, 2025

Mr. Daniel Elder, Zoning Administrator
Washington County Public Works
11660 Myeron Road North
Stillwater, MN 55082

Re: Holcim Larson Quarry EAW

Dear Mr. Elder,

Thank you for the opportunity to submit comments on the Environmental Assessment Worksheet (EAW) for the Holcim Larson Quarry Project. The International Union of Operating Engineers Local 49 (IUOE Local 49) is a construction labor union representing 15,000 heavy equipment operators and their families in Minnesota, North Dakota, and South Dakota. Our members work in a wide array of industries across the state performing construction, maintenance and operations work—including construction and aggregate mining.

The workers at the existing Larson Quarry are members of IUOE Local 49 and are local to the region. The facility provides family-sustaining wages and benefits for our members and their families. As noted in the EAW, the current facility is projected to exhaust its reserves in the next 5-7 years. Approval of the proposed expansion is critical to their retention and continued employment at the facility and would extend the life of the facility for 20 to 25 years.

Beyond the direct employment of our members at the facility, the proposed project is critical to ensuring a needed and cost-effective supply of construction-grade aggregate materials to ready mix plants in the twin cities region. As the largest construction union in the state, we know how important a

local supply of concrete products is to keeping construction projects on time and on budget. Without this project it is likely that a new source of aggregate materials would need to be identified and would likely be much further away. This would increase costs for construction projects, traffic congestion resulting from the additional trucking requirements, and greenhouse gas emissions. If a new source of aggregate were not identified, critical infrastructure projects could be delayed, resulting in fewer job opportunities for our members and impacting overall economic growth in the region.

Having reviewed the EAW, we believe the project does not have the potential for significant environmental impacts and thus a full Environmental Impact Statement (EIS) is not required under state law. As noted in the EAW, an environmental review was completed for the expansion area in 2005 by Washington County and it was determined that an EIS was not needed. While the 2005 EAW did not include the proposed option of relocating County Road 75, thus necessitating the present EAW, that additional proposal does not create the potential for significant environmental impacts. As a result, we would respectfully encourage Washington County to determine that a full EIS is not required.

The mining project developed by Holcim is responsible and would appropriately protect and mitigate impacts to the environmental resources in the region. We thank Washington County for your ongoing work on this project and the opportunity to provide comments. We fully support the project and would encourage its timely approval to provide assurance of future employment to our members that work at the facility.

Sincerely,

John Pollard, Political Director, International Union of Operating Engineers Local

Grant Johnson
President



Ronald Johnson
Vice President

Valentina Mgeni
Secretary

Michael Childs Jr.
Treasurer

Constance Campbell
Assistant Secretary/Treasurer

January 16, 2025

Washington County Public Works North Shop
11660 Myeron Road North
Stillwater, MN 55082
PublicWorks@co.washington.mn.us

Re: Comments on the proposed Larson Quarry expansion

To whom it may concern,

The Community Council of the Prairie Island Indian Community (“Community”) provides these comments to the Environmental Assessment Worksheet (“EAW”) prepared for the Holcim-MWR, Inc. (“Holcim”), proposed Larson Quarry expansion.

The Community has concerns about this project, including the lack of consultation and its potential impact on cultural and natural resources. One of the most troubling issues is the statements made by Holcim, the proponent of the project, that the Community’s Tribal Historic Preservation Office (“THPO”) was consulted and worked in “coordination” with Holcim. This is not true. THPO has had no input and provided no “coordination” in the archaeological surveys at this site, nor has THPO been consulted with or provided “cooperation” in any survey to identify cultural properties at this site. The Community also is not aware of any consultation with the Minnesota Indian Affairs Council (“MIAC”) beyond a general presentation about the project less than two weeks before the comment deadline. This lack of consultation is particularly alarming to the Community due to the potential for burial sites at the project location. The archaeological assessment has discounted possible burial mounds, previously identified on the site, as merely “waste piles” from previous construction. MIAC has been empowered to authenticate burial sites and there has been no indication that MIAC has been consulted and performed the necessary investigation to determine the veracity of these claims. Until that determination is made, the assumptions of Holcim regarding potential burial sites are premature.

This project is estimated to involve an area that is within one acre of the threshold for a mandatory Environmental Impact Statement (“EIS”) to be completed. When making the decision whether an EIS should be performed that estimate should be viewed with skepticism and the proximity to the mandatory threshold should factor heavily in favor of ordering an EIS be completed.

COMMENTS FROM THPO

1. Did not demonstrate consultation with MIAC.

In a letter to Holcim's engineer, Tyler Dahm of Sunde Engineering, dated July 3, 2023, Sarah Beimers, Environmental Program Review Manager for the Minnesota State Historic Preservation Office, recommended Holcim consult with MIAC pursuant to MN Stat 307.08 due to known burial sites reported "in the vicinity" of the proposed project. At this time, the Community has seen no evidence that this consultation ever took place.

2. Did not adequately consult with THPO.

Despite the claim of Holcim, THPO has not provided "cooperation" in cultural property surveys. THPO Officer Noah White has advised the Community Council that he has not been consulted, has not participated in, nor provided "cooperation" with these surveys. It is appalling that the Tribal peoples closest in physical proximity to this project, and within whose traditional homelands it is taking place, have not been heard or even been contacted regarding the identification of their relatives' burial sites and the cultural properties that are part of the history and, indeed, the very identity of the Community.

3. Incorrect site number.

A site number used in the Figure 4 is incorrect. It is surprising that such a basic bit of information was incorrect in the archaeological final report.

4. Inaccurately describes Dakota as being "Nomadic."

Describing the Dakota people as "nomadic" has been used to undermine their claims to their homelands and portray them as uncivilized wanderers lacking a true "home." This is insulting. The Dakota have been here for millennia and our homeland was not limited to the European concept of what is a community or what is a home. To the Dakota, this is akin to saying that, when a person travels to the grocery store or butcher to get food or spends time at their summer cabin to fish, that they are "nomadic" and have no home to claim as their property. This is disrespectful to Indigenous peoples, is dismissive of our culture and history, and is an attempt to diminish and marginalize our people and our culture.

5. Did not include Paul Durand in the literary review.

Paul Durand's extensive ethnographic data and map, Where the Waters Gather and the Rivers Meet: An Atlas of the Eastern Sioux, is considered an essential reference for understanding known locations of Dakota sites of various types. It is deeply concerning that the literature review ignores this irreplaceable resource, especially considering that it contains information of direct relevance to the area where archaeological survey was conducted. This lack of inclusion of a preeminent voice calls into question the thoroughness of the review.

6. Did not utilize MNModel to aid in survey planning.

MNModel is a critical tool in Minnesota archaeology and provides guidance for the planning and conduct of archaeological surveys. The manner in which the surveys were conducted in this case does not appear to be consistent with site presence predictions in that model; MNModel 4 predicts high likelihood of unknown/unreported sites in that location, which should dictate a tighter survey interval than 15 meters.

7. Inadequate shovel testing at the site.

The EAW Did not describe the reasoning of the survey methodology of shovel testing interval of 15 meters. The wide intervals between shovel test locations seems arbitrary and unsupported given the known historic and cultural sites close to the project location. The Community believes more closely spaced testing locations are needed to adequately survey the project location.

Based on the information presented in the archaeological survey report, it appears that we are to believe six or seven people conducted 2,016 shovel tests in a highly wooded area in six days. To conduct 2,016 shovel tests in six days is 336 a day. If a shovel test takes 20 minutes each that is 6,720 minutes, divided by 60 minutes in an hour, equals 112 man hours per day to accomplish this. That is seven people working at that pace for 16 hours every day without a break to set up equipment, sift material, examine for artifacts, document the result, move to next location 15 meters away, and set up for another test. We do not believe that the claimed shovel tests could have been performed in a reasonable manner in that timeframe, especially considering winter soil conditions and that there are only nine hours of daylight at the specified time of survey in late November and early December.

COMMENTS FROM LAND & ENVIRONMENT DEPARTMENT

MN Administrative Rule 4410.4400, titled “Mandatory EIS Categories,” defines projects that require an EIS based on location and acreage of the proposed project. Subp 9(C) of the rule covers Non-Metallic Mining and states “for development of a facility for the extraction or mining of sand, gravel, and stone, or other non metallic minerals other than peat, which will excavate more than 40 or more acres of forested or other naturally vegetated land in a sensitive shoreland area or 80 or more acres of forested or other naturally vegetates land in a nonsensitive shoreland area” an EIS is required.

The Larson Expansion EAW estimates the wooded/forested acres as 133 before and 34 acres after the project, meaning the plan is to excavate 79 acres. It seems all too convenient that the proposal estimates the acreage as one single acre below the mandatory EIS threshold. These figures are estimates and mineral mining is not a precise endeavor, so it is quite possible the final project will exceed the 80 acre threshold for an EIS. On a project this close to a mandatory threshold the scales should tip heavily in favor of requiring the completion of an EIS.

Based on the deficiencies and inaccuracies in the EAW, and the proximity to the threshold triggering a mandatory EIS, the Community believes that, if this proposed project is to proceed, there must be a more complete and accurate assessment of the impacts on cultural and natural resources and, at the very least, an Environmental Impact Statement must be completed.

Pidámaya (Thank you),

A handwritten signature in blue ink, appearing to read 'G. Johnson', is positioned above the printed name.

Grant Johnson
Community Council President

**PUBLIC WORKS**Wayne Sandberg, P.E., Director, County Engineer
Frank D. Ticknor, P.E., Deputy Director

January 17, 2025

Holcim Larson Quarry Expansion Project EAW

Washington County has reviewed the Holcim Larson Quarry Expansion Project Environmental Assessment Worksheet (EAW), dated September 24, 2024. Per Minnesota State Statute, an EAW has been triggered by Holcim-MWR, Inc. (Holcim)'s proposal to expand its existing Larson Quarry at 10120 Grey Cloud Island Drive South in St. Paul Park, Minnesota, 55071. The expansion project is proposed to expand the existing limestone quarry onto a 148-acre property located east of the current approved mining area. Washington County Public Works understands that the expansion of the mining area is estimated to extend the life of mining activities at Holcim's Larson Quarry by approximately 20-25 years.

The existing subsurface limestone resources located on Upper Grey Cloud Island have significant regional benefit. Aggregate products, such as the materials comprised at the Larson Quarry and at the proposed expansion area, are vital to the construction industry in our rapidly growing county. Per the Washington County Development Code, Washington County will continue to support new mining endeavors and maintain existing mining operations in order to maintain geographically disperse mining operations within Washington County. Because the aggregates industry provides a critical commodity to the local economy, Washington County believes the remaining limestone resources on Upper Grey Cloud Island have significant regional benefit and continuing to harvest these local resources is reasonable if the appropriate environmental processes are undertaken and all permits are received.

Washington County's Mining Land Use Authority

Because the proposed expansion area is located in an unincorporated community of Washington County, the Washington County Development Code applies to Holcim's mining operations. Chapter 7 of the Development Code, Mining Regulations, is intended to provide for the economic availability and removal of natural resource materials within Washington County. The provisions set forth within the Development Code establish regulations, safeguards, and controls for this jurisdiction regarding noise, dust, traffic, drainage, and groundwater quality to minimize environmental and aesthetic impacts on mine or mine-adjacent property.

Chapter 7 of the Development Code sets requirements for mining permitting within Washington County's jurisdiction. The Larson Quarry is currently operating under a valid Washington County 5-year Conditional Use Permit (CUP), which was issued on May 31, 2023. Upon completion of the environmental analysis process for the proposed expansion project, permitting can commence to update the CUP to include the expanded area. The County will review the permit at that time and consider the conditions required to mitigate any potential impacts within the EAW. Washington County Planning Advisory Commission (PAC) will consider an amendment to the 5-year Conditional Use Permit (CUP).

In addition to the County's permit, the mine will need to work with Grey Cloud Island Township to complete any zoning permits for the project.

Transportation

Washington County Public Works understands that Option 1 would require significant realignment of County Road 75 (Grey Cloud Island Dr S). Washington County Public Works would support Option 1 if Grey Cloud Island Township assumes jurisdiction of the entire extent of County Road 75, because the permanent relocation of the roadway as shown on Option 1 Site Plan (C2.1) would no longer provide the functions of a county highway due to the circuitous route. If Option 1 were to be pursued, a jurisdictional transfer of County Road 75 from Washington County to Grey Cloud Island Township, at the expense of Holcim, would need to be facilitated before the permanent realignment of County Road 75.

Washington County Public Works understands that Option 2 would require a temporary realignment of County Road 75. Washington County Public Works acknowledges that the aggregate material below the roadway within the County's public right-of-way has significant regional benefit and therefore Public Works supports a temporary realignment of the County Road to allow mining in the County's public right-of-way to occur. If Option 2 were to proceed, the provisions of the temporary realignment of the County Road would be identified through Washington County's transportation permitting process.

While Washington County Public Works would support both options identified in the EAW, the preference is for Option 2 to proceed into permitting since previous communication with the Township indicates that they do not have the financial resources to maintain an additional roadway.

Coordination with Washington County will be required to determine the specific details of the proposed infrastructure in the County's public right-of-way. Regardless of the option selected, the following items need to be taken into consideration. The considerations include, but are not limited to:

1. All temporary and final conditions of County Road 75 within the County's public right-of-way must be constructed in accordance with MN State Statute 8820 for a 40 mile per hour (mph) design speed.
2. All work associated with the temporary and/or permanent realignment of County Road 75 would be paid for by Holcim.
3. All property required for temporary and/or permanent realignment of County Road 75 would be dedicated to the applicable agency, at the expense of Holcim.
4. Holcim will need to obtain the necessary transportation permit(s) from Washington County Public Works for work within the County's public right-of-way.
 - a. A Washington County Access Permit is required for any new driveway, commercial access, field entrance, or private/public street to a Washington County highway, or for a modification

A great place to live, work and play...today and tomorrow

Government Center | 14949 62nd Street North | P. O. Box 6 | Stillwater, MN 55082-0006
P: 651-430-6001 | F: 651-430-6017 | TTY: 651-430-6246
www.co.washington.mn.us

Washington County is an equal opportunity organization and employer

or change in use of an existing access. A permit application shall be submitted 30 days prior to the start of work – additional time may be required if plan revisions are needed. In addition to the applicable fee, a refundable deposit is required, based on the scope of work.

- b. A Washington County Right Of Way Permit is required for work which obstructs the right-of-way, grading in County right-of-way, utility installations and maintenance, etc. Permit requirements include an application, registration form, location map, sketch/plan, temporary traffic control plan (if requesting obstruction/closure/detour), and Certificate of Liability Insurance.
5. Those occupying, using, or seeking to occupy or use the right-of-way, or place any equipment or facilities in the right-of-way, must be registered with Washington County. A Right Of Way Occupancy Registration Form is available on Washington County's website.

Washington County Public Health and Environment

Washington County Groundwater Planning Team appreciates the attention to previous comments within the EAW and has the following additional comments:

1. There is record of individual Subsurface Sewage Treatment Systems (SSTS) within the mapped area. Any sewage tank(s), drywells/cesspools, or SSTS component(s) located shall be properly abandoned. A County permit for septic system abandonment shall be submitted to the Washington County Department of Public Health and Environment.
2. Any water supply wells located during the expansion or active mining phases need to be sealed according to Minnesota Department of Health regulations to mitigate potential groundwater contamination.
3. All solid and hazardous waste, including waste from historic dumping, must be removed from the property and managed at an appropriately permitted waste disposal facility.
4. Washington County Groundwater Plan and guidelines expect appropriate planning and project execution when developing in or around areas with karstic geologic features. We emphasize the need to follow MPCA and Minnesota state standards when mine activity alters or impacts groundwater and/or quality.
5. Project dewatering and general water use should not impact the water quality or quantity of private wells in the surrounding area.
6. The Project Site overlaps with and/or is closely situated to PFBA and PFOS contaminated areas. If moving soil in a PFAS contaminated area, the project will need to follow MPCA rules. Monitoring and testing mechanisms should be put in place for tracking on-site developments of PFAS contamination if such occurs.

A great place to live, work and play...today and tomorrow

Government Center | 14949 62nd Street North | P. O. Box 6 | Stillwater, MN 55082-0006
P: 651-430-6001 | F: 651-430-6017 | TTY: 651-430-6246
www.co.washington.mn.us

Washington County is an equal opportunity organization and employer

Reclamation

Washington County interprets the reclamation plan submitted with the Larson Quarry Expansion Project EAW to be consistent with what's been submitted and approved for the Larson Quarry's current 5-year Conditional Use Permit (CUP), which was issued on May 31, 2023. Washington County Public Works is comfortable with the plan identified and will further coordinate the details of the final condition for the manmade lake through the future 5-year CUP permitting process. The reclamation plan will need be reviewed by the Washington County Conservation District through the CUP process and the applicant will be required to comply with recommendations from the Conservation District. The end use of the setback areas outside of the unnatural lake will need to follow Township zoning regulations. Final development of the setback area(s) will be coordinated through the applicable agency's development approval process.

Thank you for the opportunity to review the Holcim Larson Quarry Expansion Project EAW.

Respectfully submitted,

Wayne Sandberg

Wayne Sandberg, PE

Director of Public Works & County Engineer
Washington County Public Works

A great place to live, work and play...today and tomorrow

Government Center | 14949 62nd Street North | P. O. Box 6 | Stillwater, MN 55082-0006
P: 651-430-6001 | F: 651-430-6017 | TTY: 651-430-6246
www.co.washington.mn.us

Washington County is an equal opportunity organization and employer



United States Department of the Interior

NATIONAL PARK SERVICE
Mississippi National River and Recreation Area
111 E. Kellogg Blvd., Ste 105
St. Paul, Minnesota 55101-1256

Record Class: 1.A.1

January 17, 2025

Daniel Elder, Zoning Administrator
Washington County
11660 Myeron Road North
Stillwater, MN 55082

Dear Administrator Elder:

The National Park Service (NPS) appreciates the opportunity to comment on the Environmental Assessment Worksheet (EAW) for the proposed Larson Quarry expansion. The project is located within the Mississippi NRRRA, a national park unit encompassing the Mississippi River's 72-mile corridor through the Minneapolis-Saint Paul metropolitan area. The NPS is responsible for protecting the corridor's natural, cultural, scenic, scientific, economic, historic, and recreational resources.

Although the proposed project does not occur directly within the Mississippi River, its location within the MNRRA boundaries and the Mississippi River Corridor Critical Area (MRCCA) raises concerns about potential impacts to water and watershed resources, as well as the broader ecological and scenic values of the corridor. This segment of the river corridor holds national significance, with special federal regulations under sections 704(b) and 705(d) of the Arizona-Idaho Conservation Act of 1988 (AICA), Public Law 100-696.

Section 705(d) of the AICA states, "...For the purpose of protecting the integrity of the Area the Secretary shall cooperate and consult with the State and the appropriate political subdivisions to ... determine the adequacy of enforcement of such [state and local] plans, laws, and ordinances, including review of building permits and zoning variances granted by local governments, and amendments to local laws and ordinances." Under this authority, the NPS has the responsibility to evaluate state and local actions within the MNRRA, including those in Grey Cloud Island Township, to ensure their compatibility with the MNRRA Comprehensive Management Plan (CMP) and the preservation of the corridor's resources. The park's CMP, signed by the Governor of Minnesota and the Secretary of the Interior, incorporates by reference relevant state rules, establishing the NPS's legal obligation to review MRCCA-related ordinances and activities to ensure consistency with federal and state preservation objectives.

While the NPS recognizes that the EAW is a state-level environmental review, the proposed quarry expansion raises important federal and local concerns related to land use, ecological integrity, and scenic resources. It is essential that the project aligns with MRCCA and CMP goals, as well as the conservation objectives of the MNRRA.

Thank you for your attention to the following comments, which address the issues raised in the EAW and their implications for the Mississippi National River and Recreation Area.

Section 1 - Land Use (pg. 25) MNRRA and MRCCA

“For a project to be compatible with the MRCCA, the land use must be managed to maintain the character of the river corridor within the context of residential and neighborhood development, and also to protect and enhance habitat, parks and open space, public river corridor views, and scenic, natural, and historic areas. The proposed project complies with MRCCA setback requirements, and the mining limits will be far enough from the Mississippi River and the Grey Cloud Channel to preserve the character of the river corridor in terms of its scenic and natural value. The post-reclamation end use is a vision of a mixture of open space, lake, and residential development which supports the Townships future rural residential land use plans. Summarily, the proposed mine expansion plan in combination with the reclamation plan is compatible with the national MNRRA Program and the state MRCCA Program.” (pg. 25)

Grey Cloud Island Township’s MRCCA ordinance (Ord. No. 60) establishes clear requirements for reclamation and vegetation management for projects like the Larson Quarry expansion. Vegetation clearing within mapped native plant communities and significant vegetation stands requires a vegetation permit (Sections 9.2 and 9.4). Under Section 9.6, a vegetation restoration plan must also be developed to restore the site in a manner consistent with the community’s vision for the area after the mining operation is completed.

The proposed project in the EAW includes extensive vegetation clearing in a mapped native plant community, and without detailed and enforceable restoration strategies, these activities pose significant risks of long-term ecological degradation. Such outcomes would directly conflict with the goals of the Mississippi NRRRA CMP and MRCCA rules, which prioritize ecological integrity and the protection of native habitats.

The NPS recommends that the township requires clear detailed reclamation and vegetation restoration plans that align with the Township’s stated post-mining land use goals, mitigate long-term impacts to ecological integrity and native plant communities, and include enforceable measures to ensure compliance with the MRCCA ordinance.

Section 1 – Land Use (pg. 27-28) Native Plant Communities and Significant Vegetation Stands

“Consequently, the loss of this forested area would not be a significant loss of unique forest resources in the region.” (pg. 28)

As identified in the EAW, “The Project Area contains one area identified by the National Park Service as a Significant Existing Vegetative Stand, and one area identified by the MDNR as a native plant community.” These are largely intact, overlapping forested areas. Despite the classification with the EAW as “common” and “degraded,” the presence of forested land still provides invaluable resources such as habitat for local native plants and animals, buffer zones to surrounding natural areas, scenic and aesthetic values, and as a site of potential future forest habitat improvements. The loss of these 79 acres within the Mississippi NRRRA and MRCCA boundaries would be a significant loss.

If you any questions regarding these comments, please contact my staff, Holly Henriksen, at holly_henriksen@nps.gov or by calling 651-293-8470.

Sincerely,

Matthew Tucker Blythe
Superintendent

CC:
Melissa Collins, MN Department of Natural Resources
Daniel Scollan, MN Department of Natural Resources



United States Department of the Interior

NATIONAL PARK SERVICE
 Mississippi National River and Recreation Area
 111 Kellogg Blvd E. STE 105
 Saint Paul, MN 55101

Record Class: 1.A.1

AICA Sec.704(b) or Sec.705(d) Determination

PROJECT NAME:	Larson Quarry Expansion			EFFECTIVE DATE:	Draft EAW Comment Due Date 1/17	
AGENCY:	Washington County					
Other parties: Holcim Industries (applicant), MN Dept. of Natural Resources, US Fish and Wildlife Service						
LOCATION DESCRIPTION						
Project Location	Latitude:	44°48' 42.27" N	Longitude:	92° 59' 42.06" W	Address:	
PROJECT DESCRIPTION						
<p>From EAW: Holcim-MWR, Inc. (Holcim) currently operates a limestone quarry, known as the Larson Quarry, located in Grey Cloud Island Township, Washington County, Minnesota. Holcim (formerly Aggregate Industries) proposes to expand the existing quarry (Project) onto a 148-acre property (Site or Project Area) located east of County Road (CR) 75, the majority of which they have owned since 1972. The Project will involve either the relocation of CR 75 around the eastern perimeter of the proposed quarry limits (Option 1) or the construction of a bridge on CR 75 with an underpass below CR 75 (Option 2) to access the eastern limestone reserves. The expansion will increase the quarry area by approximately 53 to 70 acres depending upon the option ultimately permitted.</p>						
EA						
Impacted Policies: (See Policy Tool)	Riverfront Location Policies 2, 3 Corridor-wide Location Policies 8, 9 Site Development Policies 3, 5, 13 Natural Resource Management Policy 5, 7 Native Flora and Fauna, Natural Communities, and Biodiversity Policies: 1, 2, 5 Threatened and Endangered Species Policies: 2 Cultural Resources Management Policies: 6 Economic Resources Management Policies: 13					
FINAL DETERMINATION <i>(check only one)</i>						
<input checked="" type="checkbox"/> No determination made: draft document						
<input type="checkbox"/> The project is consistent with the MNRRA CMP and provisions of 16 U.S.C § 460zz						
<input type="checkbox"/> The project is not consistent with the MNRRA CMP and provisions of 16 U.S.C § 460zz <i>(measures required)</i>						
Approved By:						
	Matthew T. Blythe, Superintendent National Park Service Mississippi National River and Recreation Area					

Riverfront Location Policies

No.	Policy Summary	Impacted	Narrative
1	New development in the first 300 feet from OHWL or floodplain, which ever greater, must have a relationship to the river, a need for a river location, or the capability to enhance the river environment. New development in area can not have detrimental effect on corridor resources.		
2	Incentivize polluting industries that do not rely on river transportation to relocate out of riverfront area.	X	Aggregate extraction is not inherently dependent on river transportation.
3	Convert inconsistent riverfront uses to consistent uses.	X	Gravel mine and associated industry infrastructure is inconsistent use.

Corridorwide Location Policies

No.	Policy Summary	Impacted	Narrative
1	Cluster new uses near similar ones to prevent sprawl and loss of open space.		
2	Residential and open space upstream of I-694 bridge in Fridley.		
3	Greater variety of land use activities, with additional open space, downstream of I-494 bridge in South St. Paul		
4	High quality and sustainable open space along with a variety of land uses between areas in policies 2 and 3.		
5	Cluster new uses near similar ones to prevent sprawl and loss of open space.		
6	Avoid floodplain and wetland development		
7	Protect endangered, threatened, and rare species (including state-listed species) and their habitats		.
8	Support mass transportation and bicycle/pedestrian infrastructure	X	Mining infrastructure impedes mass transportation.
9	Protects areas containing significant wildlife habitat.	X	Direct threats to aquatic wildlife habitat.

Site Development Policies

No.	Policy Summary	Impacted	Narrative
1	Provide uninterrupted vegetated shorelines to preserve a natural look from the river and opposite shore. Downtown areas excepted.		
2	Preservation Area System: <ul style="list-style-type: none"> • 40ft set back from OHWL that is undisturbed and restored. • 60-100ft from the OHWL allow only minimal disturbance (selective grading and tree removal) • Prohibit land disturbance along bluff face (slopes in excess of 12%). • 40ft from a bluff line is preserved in a natural state or restored with natural vegetation. • Between 60-100ft from a bluff line prevent structures over 30ft tall • Reduce visual impacts and protect views of the river and from the river and its shoreline areas by having maximum building heights. <ul style="list-style-type: none"> ○ Within 100ft of bluff line – 30ft ○ Within 200ft of river OHWL – 30 ○ Within 300ft of river – 45ft 		
3	Minimize the cumulative impacts on river resources that result from many smaller individual land development projects being implemented over time	X	Expansion of mine may result in cumulative effects on river watershed.
4	Maintain consistency of development regulation enforcement		
5	Is consistent with State Mississippi River Critical Corridor Area Rules as applicable to the local jurisdiction.	X	Development does not comply with rules.
6	Preserve and restore shoreline areas: <ul style="list-style-type: none"> • Preserve native vegetation, particularly remnant natural communities. • Use native and other compatible floodplain vegetation in redevelopment projects. 		

	<ul style="list-style-type: none"> Use native or natural looking materials to stop bank erosion. 		
7	Provide pedestrian/bicycle paths to connect the river to residential and open spaces		
8	Protect views as seen from designated overlooks in the corridor. Develop new overlooks offering significant views of the river corridor.		
9	Remove vacant, nonhistorical structures that are not needed for uses consistent with this plan		
10	Rehabilitate and adaptively reuse historic structures		
11	New river crossings must first analyze the following alternatives before constructing an entirely new crossing: <ol style="list-style-type: none"> Modifying capacity at an existing crossing Constructing within an existing crossing corridor (width of existing structure + 50ft) Using multimodal transportation options. 		
12	Protect existing wetlands and, where practical, restore degraded wetlands.		
13	Increase and restore wildlife habitat and biological diversity in development projects. Protect bottomland forests, bluff prairies, woodlands, and riverine habitats. To ensure that there is adequate nesting habitat for peregrine falcons, development should be adequately set back in areas near cliffs that are considered potential nesting sites.	X	Biodiversity may be negatively impacted.
14	Apply setback and height restrictions and careful site design to maintain the ability to view the river from existing open space and developed areas. Avoid significantly obstructing river views with development.		
15	Screen development wherever practical to minimize its visibility from the river or the opposite shoreline.		
16	Maintain existing public access to the river and increase access in redevelopment and new development projects.		
17	Incorporate scenic road design concepts and architectural treatments into road construction, reconstruction, or capital improvement projects in the corridor, with primary emphasis on parallel roads in the riverfront area and bridges over the river		
18	Protect endangered, threatened, and rare plant and animal species (including state listed species) and their habitats in site development projects.		
19	Consult with Native American groups when site development will affect any Native American cultural site.		
20	Place utilities underground in new development projects and replacing existing utilities underground in existing development.		
21	Utilize sustainable building practices, such as energy efficiency and water conservation practices		

Variance Policy

No.	Policy Summary	Impacted	Narrative
1	Refer to State of Minnesota variance policy		

Open Space and Trails Policies

No.	Policy Summary	Impacted	Narrative
1	<i>Not Applicable -- NPS defined action.</i>		
2	Provide easements for future trail corridors in new developments.		
3	Design the sites to preserve most of the land in a natural state. Large tracts of open space that are currently undeveloped should stress passive recreation, fish and wildlife resources, plant communities, and biological diversity.		
4	Coordinate with communities to develop links from neighborhoods to the corridor.		
5	Require new major private developments and all public facilities to provide appropriate public trails and river access.		
6	Provide pedestrian and bicycle paths to the greatest extent practical, developing separate alignments in heavily used areas to reduce conflicts. Ensure access across all new and rebuilt public bridges.		

7	Use abandoned railroad right-of-way when available, and monitor potentially abandoned railroad property as shown on system maps kept by the Minnesota Department of Transportation for possible trail development or other open space needs.		
8	Locate trails as close to the river as practical and provide strategic connections to other trails in the area.		
9	Use existing authorities to avoid, minimize, or mitigate actions that would convert land acquired with federal recreation grant assistance to uses other than public outdoor recreation and open space.		
10	<i>Not Applicable -- NPS defined action.</i>		

Commercial Navigation Policies

	Policy Summary	Impacted	Narrative
1	<i>Not Applicable -- NPS defined action.</i>		
2	Locate barge fleeting areas at least 200 feet from any marina and next to commercial or industrial areas.		
3	Evaluate the potential for bottom disturbance and sediment resuspension from prop wash and bank erosion caused by towboat wakes before making decisions to locate new (or relocate existing) barge fleeting areas.		
4	Evaluate potential noise and visual impacts before making decisions to expand or locate barge operations.		
5	<i>Not Applicable -- NPS defined action.</i>		
6	Prohibit temporary casual mooring in the corridor except in emergencies.		
7	Dredged material should be placed where it could be reused for beneficial purposes. New material placement sites in the corridor will be designated in a manner consistent with the visions and policies contained in this plan.		
8	The impacts on local, state, and regional economies, with particular reference to agriculture, will be assessed and considered as part of the established federal, state, and local review process in connection with all plans and projects that could affect the commercial navigation system in the corridor.		

Natural Resource Management Policies

No.	Policy Summary	Impacted	Narrative
1	Potential new sources of pollution will be rigorously reviewed to maximize pollution prevention opportunities and to further reduce the effect of pollutant loadings on the quality of the fishery, the quality of drinking water supplies, or air quality in the corridor.		
2	Reduce runoff with increased storm water retention in new construction and redevelopment projects.		
3	<i>Not Applicable -- NPS defined action.</i>		
4	Comply with existing pollution control regulations.		
5	Projects include pollution prevention and increased pollution control	X	Activity does not increase level of pollution control from baseline
6	Reduce the use of chemicals for fertilizer and pest control in agricultural and residential areas and on public lands		
7	Clean up corridor lands that are adversely affecting or could adversely affect the river environment, such as landfill sites that are leaking, sites that could present a hazard to public safety, or sites that could delay recreational or other desired uses of the corridor.	X	Gravel mine infrastructure may adversely affect river environment.
8	Evaluate noise issues, including noise from commercial and recreational boat traffic on the river and traffic on parallel roads and bridge crossings.		
9	Reduce the use of salt on area roads by use of alternative materials and increased efficiencies in winter maintenance, considering the needs of public safety.		
10	Increase the use of devices such as skimmers on small tributary creeks to capture and reduce the amount of floating debris carried into the river.		
11	Reduce the potential for spills from single hull barges, rail cars and tanker trucks carrying hazardous cargo through the MNRRA corridor.		

12	Complete the cleanup of contaminated sites more quickly by ensuring a higher priority rating for state and federal Superfund sites in the corridor.		
13	<i>Not Applicable -- NPS defined action.</i>		
14	Utilize alternatives to lawns in the shoreline area to reduce fertilizer and pesticide runoff into the river.		
15	Develop and implement spill prevention and response plans for the river. This should include all potential sources, such as point sources and pipelines, railroads, barge traffic, and other transportation modes.		
16	<i>Not Applicable -- NPS defined action.</i>		
17	<i>Not Applicable -- NPS defined action.</i>		
18	All new marinas to have dumping stations to help prevent the discharge of human waste into the river.		
19	Protect stream banks and water quality from the negative impacts of recreation activities.		
20	Review federal regional air quality permit applications to assist in preventing further deterioration of the corridor's air quality.		
21	Comply with federal, state, and local floodplain and wetland protection policies and restore degraded wetlands.		
22	Decrease the volume of toxic wastes and emissions in the river corridor.		
23	Prevent and control sources of pollution, especially phosphorus loading, to the Minnesota River, which directly affects the quality of water in the MNRRA corridor.		
24	<i>Not Applicable -- NPS defined action.</i>		
25	Address the issue of contaminated river bottom sediments		
26	Reduce the effects of two cycle boat engines on water quality in the river.		

Native Flora and Fauna, Natural Communities, and Biodiversity Policies

No.	Policy Summary	Impacted	Narrative
1	Protect wildlife habitat and biological diversity.	X	Wildlife habitat and biodiversity may be negatively impacted.
2	Increase and restore wildlife habitat and biological diversity in development projects. Protect bottomland forests and riverine habitats.	X	Lack of detailed habitat restoration plan.
3	When feasible, include uninterrupted vegetated shorelines that exceed the minimum 40foot dimension (as discussed in site development policy number 2 in the land and water use section above) to facilitate wildlife movement along the corridor.		
4	Coordinate land development policies to protect natural resources using a system of preservation areas (as described in site development policy number 2 in the land and water use section above).		
5	Preserve native vegetation and revegetation; use native and other compatible floodplain vegetation in redevelopment projects; revegetate existing denuded areas along the shoreline; and use extensive native vegetation, including native trees and shrubs, in the more formal landscape treatments appropriate to downtown areas.	X	More detailed re-vegetation and restoration plan required.

Threatened and Endangered Species Policies

No.	Policy Summary	Impacted	Narrative
1	Comply with federal, state, and local requirements to protect endangered, threatened, and rare species (including state listed species).		
2	Preserve and enhance habitat that is of special value to threatened and endangered species.	X	Endangered species habitat is not enhanced.

Floodplains and Wetlands Policies

No.	Policy Summary	Impacted	Narrative
1	Comply with federal, state, and local requirements to avoid floodplain and wetland development.		
2	Protect existing wetlands and, where practical, restore degraded wetlands.		

Cultural Resources Management Policies

No.	Policy Summary	Impacted	Narrative
1	When possible, continue the historic uses of historic properties. New uses of historic properties should be consistent with other policies in the MNRRA plan.		
2	Preserve and increase open space land use in order to protect significant archeological resources. Provide adequate identification, evaluation, and site planning to preserve these resources.		
3	Preserve historic structures and cultural landscapes in their present condition if that condition allows for satisfactory protection, maintenance, use, and interpretation, or if another treatment is warranted but must be delayed.		
4	Rehabilitate historic structures and landscapes for contemporary uses if they cannot adequately serve in their current condition, and if rehabilitation will not alter integrity or character.		
5	Restore historic structures and landscapes to an earlier appearance if restoration is essential to public understanding of the cultural associations of the area and sufficient data exists to permit restoration with minimal conjecture.		
6	Economic activities preserve and rehabilitate historic resources in the corridor consistent with other policies in the MNRRA plan.	X	Economic commercial activity is not consistent with other policies.
7	<i>Not Applicable -- NPS defined action.</i>		
8	<i>Not Applicable -- NPS defined action.</i>		

Economic Resource Management Policies

No.	Policy Summary	Impacted	Narrative
1	<i>Not Applicable -- NPS defined action.</i>		
2	Businesses should invest in the river corridor consistent with the values identified in the MNRRA legislation.		
3	Preserve riverfront land for economic uses that rely on the river.		
4	Protect historic buildings for adaptive reuse.		
5	<i>Not Applicable -- NPS defined action.</i>		
6	Continue existing land uses in the corridor.		
7	Allow redevelopment and expansion of corridor businesses.		
8	<i>Not Applicable -- NPS defined action.</i>		
9	<i>Not Applicable -- NPS defined action.</i>		
10	Continue barge fleeting areas and allow for some expansion in fleeting activity.		
11	<i>Not Applicable -- NPS defined action.</i>		
12	<i>Not Applicable -- NPS defined action.</i>		
13	Increase visitor access and recreational use in the corridor.	X	Mining development will not increase visitor access and recreational use.
14	<i>Not Applicable -- NPS defined action.</i>		
15	Preserve riverfront investment and encourage riverfront improvement with a wide variety of land uses.		

16	<i>Not Applicable -- NPS defined action.</i>		
17	<i>Not Applicable -- NPS defined action.</i>		
18	<i>Not Applicable -- NPS defined action.</i>		

Visitor Activities and Recreational Resources Policies –

No.	Policy Summary	Impacted	Narrative
1	<i>Not Applicable -- NPS defined action.</i>		
2	<i>Not Applicable -- NPS defined action.</i>		
3	Provide diversity in public park and recreation facility types, high quality in construction, and consistency in visitor use facility design along the corridor.		
4	<i>Not Applicable -- NPS defined action.</i>		
5	<i>Not Applicable -- NPS defined action.</i>		
6	<i>Not Applicable -- NPS defined action.</i>		

Visitor Use Management Policies –

No.	Policy Summary	Impacted	Narrative
1	New major private developments and all public facilities to provide public trails and river access.		
2	Continue the use of existing marinas and river access sites. Development of new marinas and launch ramps will be based on analyses of demand, impacts, and use capacity.		
3	Provide additional pedestrian and bicycle paths in the corridor consistent with resource preservation. Separate facilities in heavily used areas. All new and rebuilt bridges that are constructed using public funds must have bike and pedestrian paths.		
4	Acquire abandoned railroad right-of-way for trail development or other open space needs consistent with the National Rails to Trails Act.		
5	<i>Not Applicable -- NPS defined action.</i>		
6	Increased user safety, especially in the urban areas of the river corridor. Example actions include adequate unbreakable lighting, emergency stations for calling for help, increased police patrols, and safe facility and trail designs.		
7	Compliance with the Americans With Disabilities Act. Provide visitor access and programs in compliance with all federal, state, and local regulations. Facilities will be accessible to all users to the maximum extent practical. For example, accessible fishing docks will be provided at selected locations.		
8	<i>Not Applicable -- NPS defined action.</i>		



Outlook

FW: Larson EAW

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Fri 2025-01-17 12:41 PM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

Scott Molitor | Office Specialist
Washington County Public Works
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6893

To plan, build, and maintain a better Washington County

-----Original Message-----

From: jetfarmer@earthlink.net <jetfarmer@earthlink.net>
Sent: Friday, January 17, 2025 12:41 PM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: Larson EAW

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

I would like to see CO Rd stay where it is. I have concerns that if the road gets moved the number of trucks will be going along the Channel and would cause a considerable amount of noise. Where the proposed road would be there would not be much to mitigate the noise Additional I question where the water run off would go? Probably right in the river.

Of course if Holcim would move the entrance to the North side of quarry that would certainly help with noise levels.

I have lived here since 1991 and besides the noise..the trucks routinely exceed the speed limit and with proposed road that could lead to safety issues.

When I purchased my house in1988 I knew the mine would come someday but did not know about road being moved. I know the mine makes noise but nothing like semi trucks blasting through your yard.

Steve Christensen
9747 grey cloud island drive

Division of Ecological and Water Resources
Region 3 Headquarters
1200 Warner Road
Saint Paul, MN 55106
January 17, 2025

Transmitted by Email

Daniel Elder
Zoning Administrator
Washington County
11660 Myeron Road North
Stillwater, MN 55082

Dear Daniel Elder,

Thank you for the opportunity to review the Larson Quarry Expansion Environmental Assessment Worksheet (EAW) for the project located in Washington County. The DNR respectfully submits the following comments for your consideration:

1. Page 8, Reclamation: This section states that post-reclamation, a shallow bay wetland area will be created at the south end of the quarry lake with a deeper bay providing boat access to the east. Most of the lake perimeter will be left as vertical limestone bluffs, and the entire quarry expansion area that is quarried will become a lake once dewatering operations have ceased and will not require reclamation grading or establishment of vegetation.

As part of the reclamation plan, DNR recommends establishment of a shallow aquatic bench to provide a littoral zone for the future lake. Without a littoral zone, the lake is unlikely to support a healthy ecosystem. The creation of this lake is not replacing the ecosystem value that will be lost through the removal of 79-acres of forest that is mapped a DNR Native Plant Community (NPC) - FDs37a - Oak - (Red Maple) Woodland and a Mississippi River Critical Corridor Area (MRCCA) Significant Existing Vegetative Stand. The proposed vegetation removal within the MRCCA, the Mississippi River Twin Cities Important Bird Area, and the Mississippi Flyway, a major migratory corridor, would be a significant impact. We recommend that restoration plans include native [seed mixes](#) and vegetation as much as possible.

2. Page 25, Land Use, MNRRA and MRCCA: Under Grey Cloud Island Township's MRRCA ordinance (Ord. No. 60), Section 5.24(E), an Annual Operating Permit that includes a site management plan approved by the Township is required. The site management plan must include "reclamation plans consistent with the stated end use for the land." The reclamation plan should include vegetation restoration plans consistent with the reclamation vision. DNR notes the project would involve intensive vegetation clearing within a mapped native plant community and significant existing vegetation stand. Under the Township's MRRCA ordinance, Section 9.2 and 9.4, a vegetation permit will be required. As part of this permit, a vegetation

restoration plan is required (see Section 9.6). DNR recommends the Township require a reclamation plan and vegetation restoration plan that is consistent with the community's vision for the post-mining future for this land.

3. Page 28, Native Plant Communities and Significant Vegetation Stands: This section states that, "Consequently, the loss of this forested area would not be a significant loss of unique forest resources in the region." Even degraded sites provide important wildlife habitat. "Below" sites lack occurrences of rare species and natural features or do not meet Minnesota Biological Survey (MBS) standards for outstanding, high, or moderate rank. These sites may include areas of conservation value at the local level, such as habitat for native plants and animals, corridors for animal movement, buffers surrounding higher-quality natural areas, areas with high potential for restoration of native habitat, or open space. The removal of 79 acres of forest cover within the MRCCA is a significant impact.
4. Page 34, Soils and Topography: We recommend that BWSR-approved, weed-free, native [seed mixes](#) be used to the greatest degree possible for soil and berm stabilization.
5. Page 52, Rare Features. This section does not discuss the location of the forested area within the Mississippi River Twin Cities Important Bird Area or the Mississippi Flyway. Even degraded natural vegetation is important habitat within this urban section of the Mississippi River. Losing a portion of a connected forest is a significant loss even when that forest is not in prime condition. Losing the area proposed in the project will increase habitat fragmentation in the area, and could create edge effects that negatively affect the remaining forest.
6. Page 59, Visual. Given the proximity to the Mississippi River, we recommend that project lighting minimize wildlife impacts. Animals depend on the daily cycle of light and dark for behaviors such as hunting, migrating, sleeping, and protection from predators. Light pollution can affect their sensitivity to the night environment and alter their activities. In addition to the undesirable effects of upward facing lighting, the hue of lights can also affect wildlife. LED lighting has become increasingly popular due to its efficiency and long lifespan. However, these bright lights tend to emit blue light, which can be harmful to birds, insects, and fish. The DNR recommends that any projects using LED luminaries follow the [MnDOT Approved Products for luminaries](#), which limits the Uplight rating to 0. A nominal color temperature below 2700K is preferable for wildlife, and so we recommend choosing products that have the lowest number for backlight and glare (all approved products should already be 0 for Uplight).

We also recommend that all non-essential lighting be turned off during the Mayfly hatch as well as follow the Audubon Society's Lights Out program. This program advocates for darkening all buildings and structures during the bird migration from midnight until dawn March 15 - May 31 and August 15 - Oct 31. Information on this program can be found at:

<http://mn.audubon.org/conservation/lights-out-faq>.

7. Page 61, Dust and Odors: DNR advises that chloride used in dust suppressants, such as calcium chloride, does not degrade, but instead builds up to levels that are toxic to plants and wildlife.

Thank you again for the opportunity to review this document. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Melissa Collins". The signature is written in a cursive style and is set against a light blue rectangular background.

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources
Minnesota Department of Natural Resources

Phone: 651-259-5755

Email: melissa.collins@state.mn.us

CC: Patty Bestler, Holcim – MWR, Inc.



January 17, 2025

Washington County
Attn: Daniel Elder
11660 Myeron Road North
Stillwater, MN 55082

Transmitted via email to PublicWorks@co.washington.mn.us

RE: Grey Cloud Island Township comments to the
Larson Quarry Expansion Environmental Assessment Worksheet (EAW)

Dear Mr. Elder,

Please accept the following comments to the Larson Quarry Expansion EAW located in Grey Cloud Island Township, MN (“Town”). This comment letter is submitted on behalf of the Township.

Item 6.b. Project Description

- The Hours of Operation identified in the Project Description were permitted through a special approval process in the 2023 and 2024 operating seasons. The EAW should be corrected to include the standard hours of operation established within the CUP and the Annual Mining Permit and the hours noted should be specifically noted as modified for the specific seasons.
- The figure labeled as “Inset 6-1 From Operation Plan January 1971” and referenced in the text as a 50-year planning study (1971 Plan) should be further described. It is unclear from the description if the Plan Map shown was officially adopted by the Township, Washington County or both; or if the plan was an internal operations plan produced for Sheily’s purposes. Whether the plan was officially adopted by the Township and/or the County should be clearly documented if used as basis in support of Option 1.
- The Project Description describes Option 1 and Option 2 with respect to the Proposed Project. The Project Description briefly references that the segment of CR 75 running through and adjacent to the easterly project mining area is identified within the Washington County 2040 Transportation Plan as a candidate for turnback to a Township roadway. No further analysis or description is provided regarding how the turnback could, or would, impact the Township and its infrastructure. However, preliminary conversations have indicated that depending on the Option selected that the County may, or may not, be willing to maintain the roadway. This should be addressed within the Project Description.



- Reclamation. It is unclear from the description what components of the “Reclamation Plan” have been approved, and by whom, and what components are subject to review by the Township and County in the future. This language should be corrected for clarity so that the Township and County’s roles in the reclamation are clear since it has the potential to economically impact the long-term sustainability of the Township.

Item 9. Permits and approvals required.

- The Table should be corrected to address the potential need to apply for Variances from the Township’s Ordinances, specifically related to setbacks, and planned mining activities within the setbacks (See comments related to Item 10). The Table’s Status could reflect that the need for the variances will be determined, and therefore could be reflected as, “To be applied for, if required.”

Item 10. Land Use.

- *10.a.i. Existing Land Use.*
 - The statement, “Reclamation of the Larson Quarry will provide opportunities to develop new parks and open space within the community if the community determines it appropriate;” should be removed as it does not reflect the existing condition. No reclamation activities have occurred.
- *10.a.iii. Zoning, including special districts or overlays such as shoreland, floodplain, wild and scenic rivers, critical area, agricultural preserves, etc.*
 - General Zoning Restrictions. The paragraph indicates that the Project Proposer believes that they have nonconforming rights related to the extraction within the expansion area, and therefore they do not need to follow the requirements. While that may be the Project Proposer’s position, the Township may or may not agree with the conclusion. Therefore, this section should include additional analysis regarding how Option 1 and Option 2 Concept Plans are in conflict or compliance with the current ordinance. This section should be corrected.
 - Parcel history. Since the Project Proposer indicates that non-conforming rights are applicable, historical documentation should be provided. Information should include any historical permits, land use permits or other documented approvals indicating mining in the area identified within the EAW.
 - MNRRRA and MRCCA. The analysis provides a description regarding the active mining and extraction but does not adequately address or describe the impact of the road realignment as shown in Option 1. Significant vegetation will be removed, grading activities, increased impervious surfaces, viewsheds, traffic will be rerouted into the setback area and PCA permanently, etc., and impacts should all be evaluated if the purpose of this EAW is to evaluate the road alignment that was not addressed within the 2005 EAW. This section should be corrected to address the impact within the MRCAA and to the existing natural resources within the overlay.
 - Native Plant Communities and Significant Vegetation Stands. This section acknowledges that there is impact but dismisses the significance of the impact without recognizing the



standards established by the MRCCA. The impact should be quantified, and potential mitigation identified within subsection (c.) of this item or subsequent items of the EAW. This should be included specifically for impacts within the setback area as a result of the road realignment and construction.

- Project compatibility with MNRRA and MRCCA. As previously stated, this section does not adequately address the road realignment and construction as part of Option 1. This section should be updated to clearly describe the quantity/extent of impact, especially as it relates to the road realignment and construction contemplated in Option 1.
- *10b. Discuss the project's compatibility with nearby land uses, zoning and plans listed in Item 9a above, concentrating on implications for environmental effects.*
 - While broadly addressed in Item 22., the potential impact from blasting – particularly within a reduced setback area from occupied structures – should be considered and evaluated within this section since there is no other specific item which addresses how blasting is experienced and/or impacts residential property owners. The response provided in Item 22 does not adequately discuss/evaluate the impact of blasting and vibration with nearby land uses (residential) as required by this Item.
- *10c. Identify measures incorporated into the proposed project to mitigate any potential incompatibility as discussed in item 10b above and any risk potential.*
 - Mitigation should be described here for impacts to the MRCAA and PCAs as a result of the road realignment.
 - As previously noted, this is the appropriate item to discuss the potential incompatibility between blasting activities and residential uses. This section should be updated/corrected to reflect specific mitigation related to blasting within proximity to occupied residential structures.

Item 20. Transportation

- Subsection (a) requires that the Project Proposer, “Describe traffic-related aspects of project construction and operation.” This analysis/description is not provided. A potential significant impact associated with the mining operations is the quantity of truck traffic, which is not identified or described. The number of truck trips, full load/empty, time of travel, haul routes, etc., all impact the surrounding properties and are not addressed within the transportation item. While this is a continuation of an existing use, Township residents have indicated increasing numbers of truck trips as well as changing haul routes. The only way to verify the impact is to identify the counts within the EAW analysis.
- No evaluation was completed regarding the construction traffic or trips associated with construction of the road realignment of either Option 1 or Option 2. Construction traffic will be compounded with hauling trucks from the mining operation, and the potential impact was not evaluated.



- Access should be described for Option 1 and Option 2 in more detail. The current mining operation appears to utilize secondary and/or emergency exits that will no longer be present depending on which Option is selected.
- No mitigation is identified given the current lack of analysis. Once proper analysis is completed, this section should be reviewed.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Haskamp". The signature is written in a cursive style and is positioned to the left of the typed name.

Jennifer Haskamp, AICP, SHC on behalf of
Grey Cloud Island Township



FW: feedback on Holcim EAW

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Tue 2025-01-21 8:05 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: Ted Ries <tedries@gmail.com>
Sent: Friday, January 17, 2025 4:28 PM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: feedback on Holcim EAW

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

Hello,

We're writing to share our thoughts on Holcim's proposed Larson Quarry mine expansion. We believe the proposal is problematic for a number of reasons.

Our primary concerns are:

* **Well water.** Neighbors have had problems with their well water. In one instance, Lynn Utech saw her well water drop at the same time Holcim was blasting at the town hall directly adjacent to her house. Lynn's well pump burned up because it was 14 feet out of the water when the well company came to inspect it. Holcim offered to pay to replace Lynn's well pump. To us, this indicates their culpability. The township has data to support this. It records well-water levels at test wells around the quarry. The records show the test well between Lynn and the site of blasting dropped at the same time. We believe this issue should be closely examined before approving any expansion.

* **Erosion.** Some of the ground on the northern part of the pit is more erodable than at other ends of the pit because the rock is softer there. The wall on the NE corner collapsed a couple years back and caved in. Erosion should be taken into account in any EAW.

*** Archeological assessment.** We are not convinced that the archeological assessment of Ojibwe artifacts was as thorough as Holcim suggested. Given where our property is, we believe that we would've seen some evidence if as many sample holes were dug as they claim. I understand this EAW is for the east side of the county road, but Holcim says they dug these sample holes on the west side of the road at the same time. I mow up and down that driveway, and I would've seen evidence of those holes. I would've driven over some of them, but I never did.

Holcim said it worked in conjunction with the Prairie Island Band of Ojibwe, but we asked the band's Tribal Historic Preservation Office about it, and they sounded unaware of it. Respecting this tribe is a priority of ours, and we are deeply concerned by the prospect that Holcim mischaracterized Prairie Island.

Thank you for considering our feedback.

Ted & Christina Ries
9280 Grey Cloud Island Drive S.
tedries@gmail.com
christinacap@gmail.com



FW: Comments regarding the Larson Quarry Expansion EAW

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Tue 2025-01-21 8:05 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: Beth Zaiken <bzaiken@gmail.com>
Sent: Friday, January 17, 2025 4:59 PM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: Comments regarding the Larson Quarry Expansion EAW

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

I am a resident of Grey Cloud Island township, with my home being less than 1 mile from the proposed mine expansion area. I am concerned about the potential longterm ramifications of this mine expansion and it's impact on the community and the surrounding environment--please see my comments on specific issues regarding the Larson Quarry Expansion EAW as follows:

First of all the timing and commentary period associated with this EAW are not adequate for the impact it will have on the local community. Posting the documents in mid December, with a commentary period that runs through a busy holiday season (during the coldest and most difficult time of year for people with mobility issues), and in conjunction with another EIS that proposes a similar large project in the region with the exact same comment period (the Nelson mine expansion), is the worst possible timing for public transparency and seems almost designed to keep people from noticing and commenting on the project proposed.

Holcim claims the proposed mine expansion has been proposed and understood to be the "plan" since the early 1970s. While this expansion may have been recognized by the Grey Cloud Island Township 2040 Comprehensive Plan as a potential active mining site, it is always accompanied by statements that indicate that it is dependent upon the township rezoning the area in question from it's current medium density residential zoning--which has never been a foregone conclusion and the township has never indicated it's consent or approval of this plan. The area in question is located in a region that may have once been far removed from a larger

urban community, fine for an extractive industry site, but the contiguous metropolitan area has grown around it in the last several decades on all sides. Today, in 2025, this region is now surrounded by residential areas, which continue to rapidly develop and expand. The land in question would undoubtedly be of better use to the community as a residential development rather than consumed by exploitative mining practices.

The impact of changing CR 75 as is proposed in Option 1--this realignment of the road adds more than double the distance it currently occupies and would likely prompt it's reassignment from a county road to a local one, which would create an undue burden on the local township in terms of maintenance and upkeep. The impact of trucking in it's current state has degraded the roadways condition faster than had been anticipated by the company or the township, with the township being left the responsible party. The additional distance would add to commute times and increase wear and tear on vehicles for local residents--multiplied over the years in perpetuity it is not an insubstantial concern. The longer roadway and it's placement along the perimeter of the upper island also expose traffic to more likelihood of wildlife strikes, as the large population of deer and other fauna that use this area as a throughway try to adapt to the change.

In addition, the location of the road in Option 1 is proposed as being just 200 ft from the OHW of Grey Cloud slough--with a significant elevation drop off on that side of the bluff into the slough. The curvature of this proposed road and it's proximity to a precipitous dropoff increase the danger to residents driving it in winter and during inclement weather, should they veer off the road. Possible increase in setback or additional safety measures should be considered.

This resident, while opposed to the expansion project in it's entirety, would express a preference for Option 2 (wherein the road remains in it's current location and a bridge/underpass is built at the expense of the company).

The EAW states that the area is identified as an "area with potential local conservation value" and that there is a presence of federally listed endangered species including the rusty patched bumblebee and long-eared bat, as well as many state level threatened species that are continually subject to habitat loss and degradation in this area. The Project Area is on the border between a High Potential Zone and a Low Potential Zone and within a Primary Dispersal Zone, suggesting that the likelihood of encountering a rusty-patched bumblebee in the Project Area is moderate to high. The last environmental review for the proposed expansion area was completed in 2005--20 years ago. This region has undergone significant change in it's ecology and climate since that time and a new professional survey of present endangered species should be conducted. The only mitigation efforts addressed in this document speak about the condition of the land after it's reclamation--which will not happen for 20-25 years. By then it will be far too late to help the listed species in this region.

This project is being proposed simultaneously with another by the same mining company Holcim. The Nelson Mine Backwaters Project (EIS) on the lower island is situated south and east of this location but the region is highly susceptible to various features of Karst geology that include intrusion of surface water to groundwater and various natural subterranean pathways by which groundwater travels. This EAW does not address the possible interaction of these two projects and it's effect on regional groundwater movement or quality. The lower Nelson mine project proposes to drill 200 feet into the Mississippi River Bed, while this project proposes to continually dewater the surface limestone excavation. There is no contemplation on how the drawdown of water in this upper mine might affect the quality of groundwater wells that the residential community depends on situated between the two sites--will there be additional seepage from the Mississippi river site into groundwater that is being pulled from this upper site? Could this change the direction of seepage in the aquifer? The river has a high degree of contamination that is currently not an issue with water drawn from wells but disturbing the

bedrock to such a degree might introduce opportunities for contamination that are not currently being considered.

Locals who are considering installing residential solar panels do not believe that the dust mitigation efforts proposed at the excavation site would sufficiently protect them from the effects of the trucking of these materials in distributing dust outside and around the mine boundaries. The accumulation of dust on photovoltaic panels can affect their efficiency over their lifetime, degrading the value of this type of new investment in green energy.

Additionally this EAW does not adequately address the possible noise disturbance on local residences to the north and east of the site--the company proposes using the same berm structures and dimensions it uses currently, however this site is far closer to those houses and they are at a significantly higher elevation than the properties surrounding the current excavation area--with the open Grey Cloud slough between (which will not have the same sound mitigating effect as the forested areas near the current boundaries). The burms proposed may not be sufficient to disburse the sound of blasting and equipment to those residences higher on the bluff overlooking the site.

Thank you for your consideration,
Beth Zaiken

(612) 910-3836
10700 Grey Cloud Island Dr S,
Saint Paul Park, MN, 55071

--



FW: Comments on the Holcim Mine Larson Quarry Expansion Project

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Tue 2025-01-21 8:05 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

 1 attachment (25 KB)

Larson Quarry Expansion Comments.docx;

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

From: Michael Zaiken <zaike002@umn.edu>
Sent: Friday, January 17, 2025 5:23 PM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: Comments on the Holcim Mine Larson Quarry Expansion Project

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

To Whom It May Concern,

My name is Dr. Michael Zaiken, PhD. I presently reside in Grey Cloud Island Township and am an Assistant Professor at the University of Minnesota. In both of these capacities I have significant concerns regarding the proposed Larson Quarry Expansion project. In my professional capacity, I have had extensive training in data analysis and interpretation; using that skill, I have reviewed the Environmental Assessment Worksheet provided by Holcim for its proposed expansions. I found that review deficient on countless fronts, and in the attached document I proffer specific, actionable comments with respect to issues I have noted in those respects where Holcim failed, in my considered judgment, to account for reasonable implications and contingencies which arise as likely by-products or residuals attendant on its proposed action below.

I appreciate this opportunity to submit my feedback and hope that my comments are taken with due consideration.

Best Regards,

--

Dr. Michael Zaiken PhD

Assistant Professor | [ORCID](#)

Division of Blood and Marrow Transplantation

Department of Pediatrics

University of Minnesota - Twin Cities

zaike002@umn.edu | (507)-358-4527

[Zoom \(702 123 5102\)](#)

To: publicworks@co.washington.mn.us

Holcim Larson Quarry Expansion Environmental Assessment Worksheet (EAW) Comments

1. The EAW references data collected over 20 years ago “Results of Groundwater Flow Model Simulations of Proposed Larson Quarry Expansion” dated November 29, 2004. This analysis appears to be primarily focused on water table drawdown and does not address contaminate transfer. Significant changes in groundwater contaminant classification namely PFAS and its prevalence in local groundwater warrants additional assessment of the proposed mining expansion and dewatering to evaluate the effects on local groundwater levels, contamination, flow, treatment options, and correlation to Mississippi River Discharge / Recharge interactions with local aquifers. This evaluation should consider potential impacts associated with Holcim’s Nelson Mine Backwater project to evaluate potential interactions and effects on groundwater.
2. The EAW does not include any assessment or potential hazardous implications and mitigation strategies for blasting which may occur close to residence due to mining at distances less than allowed by local ordinances. A variance has not been obtained however the EAW depicts mining at distance less than allowed by local ordinances. The sociological impacts associated with mining in close proximity to residences should be address via an EIS.
3. New mining is prohibited in the Shore Impact Zone and Bluff Impact Zone and within the required structure setback from the bluff line and ordinary high-water level (OHWL). A legal definition of “new mining” should be included to establish limits on “the expansion or movement of an existing mine” which provides no limits regarding how far a mine could expand or move it operations effectively negating the MRCCA new mining prohibition.
4. The EAW does not address noise, the current conveyor system can be heard at residences throughout the neighboring community. Please provide a noise assessment of current and proposed equipment as conveyor equipment operates continuously (beyond daytime noise standard hours).
5. The EAW proposes a reroute of county road 75 but does not address the long term economical implication for the Township if ownership of the road will be transferred.
6. In addition to the afore mentioned comments I believe the scope of the requested mining expansion should receive the diligence of a full EIS.

From Ray Kaiser -Resident Grey Cloud Island Township



Outlook

Holcim Larson Quarry EAW - Public Comments

From Stariha, Lance <Lance.Stariha@bestbuy.com>**Date** Fri 2025-01-17 5:36 PM**To** Daniel Elder <Daniel.Elder@washingtoncountymn.gov>; PublicWorks <PublicWorks@co.washington.mn.us>

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

To whom it may concern,

As the homeowner at 9260 Grey Cloud Trail, Grey Cloud Island Twp., my property sits directly across Grey Cloud Channel from the new location where Holcim Corp wants to start mining. I have had to live with the weekly blasting that shakes my house, puts cracks in my sheetrock, and disturbs the overall tranquility of living in this rural setting. We've even heard about wells for homes that about the current mining operation that have run dry due to the mining operations. We've had to deal with the unrelenting truck traffic as they haul gravel out of both mining areas. I know neighbors that used to take walks down our quiet country road, that won't anymore, due to almost being hit by this commercial traffic.

We've been battling the BNSF railroad on the 300 acre tract across the street from us for years. We've had our wells contaminated by 3M pollutants and have had to deal with water filtration issues for years. And now they want us to deal with even more mining issues? I don't want to listen to the constant machinery operation if they are allowed to move right across the channel from us. Today we can hear the cows mooing in the pasture over there. All that machinery noise would trave a straight path right across to where all our homes are lined up on the channel. And what do the citizens get for having to deal with all this? We do not want this to be approved.

Please DO NOT allow this to happen!

Lance Stariha

Resident

9260 Grey Cloud Trail

Grey Cloud Island Twp, MN 55071



Outlook

Concerns About Proposed Mining Operation near Grey Cloud Township

From Tabitha Wahlin <tpsagan@gmail.com>

Date Fri 2025-01-17 8:01 PM

To PublicWorks <PublicWorks@co.washington.mn.us>; Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

To whom it may concern,

I am writing as a homeowner in Grey Cloud Township, located across from the area where Holcim Corp. is proposing to begin mining. As someone who enjoys the natural beauty of this area, I have serious concerns about the potential impacts this mining operation could have on both the environment and my property.

One of the things I most appreciate about living here is the wildlife. I regularly see eagles in the area and enjoy watching the deer that pass through. I am worried that the mining operation will disturb their habitat, forcing them to leave the area. The noise, disruption, and changes to the land could have a significant impact on these animals, and it's concerning to think that this peaceful environment may be altered forever.

In addition to the environmental impact, I am also concerned about how the mining will affect my property. I already experience the effects of blasting from the current mine, which is located farther away than the proposed site. I can feel the vibrations in my home, and I've noticed cracks in the walls, which have been increasing over time. If the mine is moved closer to our area, I'm worried that these issues will only get worse. I'm also concerned about the potential effects on my well, as I've heard of others whose wells were impacted by nearby mining activities.

I hope that the county will carefully consider the potential effects this mining operation will have on both the residents of Grey Cloud Township and the surrounding wildlife. We moved here for the peaceful, rural lifestyle, and I am concerned that this proposed mining project could change that in a way that might not be in the best interest of the community.

Thank you for your time and consideration. I hope you will make the right decision by not approving the new proposed mining site.

Sincerely,

Tavifa Wahlin

9220 Grey Cloud Trail S.

651-304-7496



Outlook

Holcim Larson Quarry EAW - Public Comments

From Josh D. Wahlin <jdwahlin@autumntransport.com>

Date Fri 2025-01-17 8:20 PM

To PublicWorks <PublicWorks@co.washington.mn.us>; Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

Cc Josh D. Wahlin <jdwahlin@autumntransport.com>

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

To Whom It May Concern,

My name is Josh Wahlin, I live and am the property owner of 9220 Grey Cloud Trail S, Grey Cloud Island Township. I am writing to voice my concerns about the expansion of the Holcim Larson Quarry to the east side of CR 75. That chunk of land is directly across the Grey Cloud Channel from my property and I am horrified to think about the mining operation that close to the back channel and my property. There are other properties around Grey Cloud Island that are much closer to mining operations than I am that have structural damage to their homes, garages, and barns because of the dynamite blasting that occurs multiple times each week. Although we aren't as close to the mine as others are, we do have concrete foundation damage, cracks in our walls, and experience vibrations with blasting, and are stressed about how much worse it will get if Holcim is granted access directly across the channel from us.

Another concern is the amount of wildlife that reside in, on, and around the island. I am an avid outdoorsman and conservationist and love the natural habitat that the island has to offer. We have a great population of whitetail deer, turkey, waterfowl, eagles, etc. The acreage that Holcim is planning to mine, will not only be loud, annoying, and ugly, but it will also take this beautiful natural habitat away from the island and damage our wildlife populations.

I am also concerned about the history of Grey Cloud Island and the acreage that our Native American friends inhabited. The family and relatives of Grey Cloud Woman inhabited the entire area of Grey Cloud Island and I think it's unjust to allow a European company to come in and literally blow up this island one blast at a time.

Lastly, I am concerned about the back channel bluffline and what kind of damage closer blasting will have on it. We enjoy pontooning/kayaking the backchannel every summer and are amazed at the different chunks of bluff line that collapse or cave into the river each summer. Our bluffs are mostly made up of limestone which in turn can be very easily crumbled. I'm concerned with how close the mine will push the limits with their blasting and boundaries as they are already breaking the rules and blasting within the "500 foot rule of residential properties."

Thank you in advance for listening to the residents with concerns about this proposal.

Sincerely,
Josh Wahlin
9220 Grey Cloud Trail



Outlook

FW: Holcim-MWR-Inc Comment

From PublicWorks <PublicWorks@co.washington.mn.us>
Date Tue 2025-01-21 8:08 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

Thank you,

Sara

Sara Favreau | Office Specialist
Washington County Public Works, North Shop
11660 Myeron Rd N, Stillwater, MN 55082
Main: 651-430-4300 | Direct: 651-430-6977

To plan, build, and maintain a better Washington County.

-----Original Message-----

From: J E <firebehavior@yahoo.com>
Sent: Friday, January 17, 2025 9:57 PM
To: PublicWorks <PublicWorks@co.washington.mn.us>
Subject: Holcim-MWR-Inc Comment

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

I am writing to express my concerns about mining at Holcim-MWR-Inc, Grey Cloud Island Township, Washington Co, Minnesota. I do not agree with this mining proposal in any way. My stomach twisted in a knot as I researched the history and facts of this site. Several burial mounds have been noted by ARS Archeological Reconnaissance Survey. It is disrespectful and industrial greed if you keep mining the area knowing many of our Ancestors are buried near there. Expanding the mine life by twenty to twenty-five years is guaranteed to be detrimental to the people, environment, and water. All surface water of Grey Cloud Island Channel, Grey Cloud Island sloughs, Mississippi River, Mississippi backwaters, and all surrounding lakes, streams, creeks, and natural springs will forever be negatively affected. The dewatering process is an extreme threat and high risk to our Prairie Du Chien Aquifer. It is vulnerable to contamination, especially in areas of erosion or removed bedrock. All groundwater should be highly protected and preserved for emergency use, and for future generations. Displacing wildlife, forest, and rare vegetation to move this limestone somewhere else is a huge waste and extreme exploitation of our natural resources.

Say NO to the mine.

Traditional Ecological Knowledge (TEK) is the key solution to moving forward in a good way. Limestone is a natural filter that can clean water and air. Natural limestone in the environment is effective at removing heavy metals, manganese, and phosphorus. Natural limestone in the environment reduces ph levels which helps prevent harmful bacteria and algae. Natural limestone in the environment is a natural filter that has a specific purpose for cleaning the water. We need to keep our limestone where it's at, in tact, and safe from mining exploitation.

Water is life.

Respectfully,

Nibi Ogichidaa Ikwe (Water Warrior Woman) Janice Erickson Traditional Ecological Knowledge Water Consultant

To Whom It May Concern,

My name is Dr. Michael Zaiken, PhD. I presently reside in Grey Cloud Island Township and am an Assistant Professor at the University of Minnesota. In both of these capacities I have significant concerns regarding the proposed Larson Quarry Expansion project. In my professional capacity, I have had extensive training in data analysis and interpretation; using that skill, I have reviewed the Environmental Assessment Worksheet provided by Holcim for its proposed expansions. I found that review deficient on countless fronts, and below I proffer specific, actionable comments with respect to issues I have noted in those respects where Holcim failed, in my considered judgment, to account for reasonable implications and contingencies which arise as likely by-products or residuals attendant on its proposed action below.

Geology and Soils: The EAW identifies significant geological issues regarding the presence of karst-type features in the project area that have the potential to seriously affect groundwater flow and transport of contaminants at the surface. Such karst features have a peculiar system of underground drainage, and their presence can greatly enhance the chances of disturbance in groundwater movement, resulting in unforeseen effects on nearby ecosystems. Furthermore, karst areas are particularly sensitive to surface disturbances that can provide pathways for surface contaminants to easily infiltrate into the groundwater. The geologic features associated with these risks are discussed at great length on pages 28 through 35 of the EAW. Holcim's proposed mitigation strategies of stripping karst-prone bedrock and dewatering the mine are intended to address these risks but raise significant concerns about their adequacy. Of the various steps, especially the dewatering of water from mines-a common mining procedure-is surrounded by environmental issues galore. There might be considerable lowering of the groundwater level over extensive radial distances, often in the range of several kilometers away from the site. This often occurs, fairly often, in both open-pit and underground mining, whereby the water tables have to be drawn down for operations to take place. Yet, this alteration in the water table can result in the emergence of unexpected environmental consequences like the drying up of springs or streams around it that rely on a constant source of groundwater. Further, dewatering grossly affects contaminant migration relating to the natural flow of groundwater with chemical fertilizers, hydrocarbons, and landfill leachate. Extremely hazardous to surround soils and groundwater, which, due to greater depth from the excavation point, increases the distance over which contaminants may travel. Dewatering dredged sediments can also release a range of hazardous substances, including heavy metals and volatile organic compounds, both of which are known to pose significant ecological risk. Therefore, Holcim should give a very detailed mitigation plan that addresses the whole scale of these issues, especially in cases where the bedrock stripping and dewatering remain their foremost strategies. These could entail vertical barriers to eliminate or reduce contaminant migration during excavation, and organic polymers

such as chiton and cationic polyacrylamide, which enhance the efficiency of dewatering while reducing its risks to the environment. Moreover, post-mining, managed aquifer recharge could be used to recharge groundwater levels, thus avoiding long-term environmental implications. With no such higher-order mitigations in sight, Holcim's current management practice regarding the region's karst geology is very alarming. Additionally, the EAW acknowledges that there needs to be a Stormwater Pollution Prevention Plan. It would be prepared for final design along with roadway modifications. This does appear as Holcim attempting to postpone its creation after approval is received on this project to circumvent important environmental consideration processes. Given that there were multiple options for the roadways, Holcim should be required to produce a SWPPP for every option in front of approval, so that any and all possible environmental impacts could be considered and minimized.

Impact on Appropriation of Water: The EAW states that the Larson Quarry currently operates under two water appropriation permits for up to 340 million gallons per year for washing aggregate and 5,500 million gallons per year for dewatering activities. The EAW argues that these quantities of water usage will not increase under the proposed expansion. However, this argument rests primarily upon a 2005 groundwater study prepared by Barr Engineering that does not reflect an up-to-date perspective on a proposed expansion of this nature. There is no apparent evidence provided to ensure that water usage for washing the aggregate does not increase and that the stakeholders do not get open access to the groundwater model, from the EAW to make valid Holcim representations for review or independently. Although the EAW mentions various water management approaches - monitoring and assessment, adaptive use practices, and contingency plans - all these are just mentioned and no concrete proposal or action plan is attached to the document. This lack of a concrete water management plan seriously questions the potential of Holcim to address properly the issues on water appropriation for its mining operation and to ensure sustainable use of the resource. The EAW should have clearly stated proposals on how the water resources would be dealt with and that no local water supplies would be burdens, prior to this EAW being approved.

Operational Claims and Considerations: There are a number of operational claims as in the EAW such as the so-called environmentally-friendly transporting system and the mining process that are pleading to be seriously looked into. For example, the EAW claims that the barge transportation system will produce less CO₂ than an equivalent number of truck transports. While this may be true, it is not very specific or comparative to other ways of transportations. More in-depth analysis would be of benefit within the EAW on the emissions reduction emanating from the barge transport system as a function of carbon footprint from the manufacture of barges, consumption of fuel, and possible implications on surrounding structures. Similarly, it is stated in the EAW that each mining blast will be designed to minimize ground vibration and sound pressure level consistent with adequate energy to fracture the bedrock. However, the document fails to explicate both the ways in which these parameters are going to be measured and the applied particular techniques in mitigating these environmental effects. Given

the likelihood of blasting activities to impact local communities, wildlife, and ecosystems, more detail should be provided in the EAW regarding measures taken to minimize these impacts and the monitoring processes to ensure that environmental standards are met. The EAW also raises concerns related to the mine's dewatering process, especially in light of the increasing frequency of drought conditions in the region. Although this is the most important consideration, the EAW does not take into consideration the issue of mining a dewatered mine during a drought. This needs to be considered in a more detailed analysis of how the climate variability factor may impact the dewatering at the mine and how these alterations in the mine would disrupt local ecosystems further. Moreover, water utilized for site dust control can result in contaminated runoff, but the EAW does not examine whether the discharge of this water can be injurious to local habitats or water quality. Also, the EAW's proposed stormwater runoff disposal by the creation of lakes is not without its problems. The chemical makeup of such lakes in respect to pH and other chemical factors has not been satisfactorily addressed. It will be important to consider how the water chemistry may evolve over time and affect biological processes and local wildlife. Moreover, standing bodies of water can become breeding sites for pests, such as mosquitoes, which could lead to other ecological consequences. In relation, the EAW should be discussed in detail in long run ecological effects created by the construction of such lakes, and how they would be managed without causing an adverse effect on anything.

Protection and management of habitat - According to the EAW setbacks as well as buffers zones should be considered while saving the sensitive habitats from detrimental effects of the mining activities. Nevertheless, all these measures are actually effective, depending on design, implementation, and management. Where the setbacks are designed to be too narrow, they cannot guarantee protection from noise, dust, and other disturbances emanating from the mines. Unless actively managed, a buffer zone would not ensure the prevention of the encroachment of invasive species and the maintenance of native vegetation, and therefore may fail in its function. Thus, specific management of habitats needs to be developed, entailing particular actions to maintain native plant species, control invasive species, and preserve critical habitat. The EAW should contemplate comprehensive habitat assessment to outline the precise needs of sensitive species in the area, which could provide design specifics for buffer zones and setback areas.

Monitoring and Adaptive Management: EAW's proposed general program for monitoring on the project has not been forthcoming with the actual parameters to be monitored, that is, populations of species or actual water quality conditions, habitat condition, and time for monitoring. Unless these specifics are agreed on, it could be difficult for a credible plan to be enacted that would lead to the reasonable and timely detection of potential adverse impacts. Further, EAW does not specify an adaptive management plan. The EAW, based on monitoring showing a sensitive species population decline or other environmental damage, should outline specific mitigating actions. Without a plan, there is the possibility of prolonged degradation without

opportunity for intervention. A far more robust program of monitoring and adaptive management will be required if the project is to respond in a timely and effective manner to environmental concerns.

Invasive Species Management: The potential introduction of invasive species through the construction activities is one of the major environmental concerns. Although the EAW mentions possible measures, such as equipment cleaning and monitoring for invasives, it does not really provide a detailed, actionable plan to prevent the spread of these species. This can be very disruptive to local ecosystems, where invasives often outcompete native flora and fauna. If the construction equipment is not well cleaned or if materials brought to the site contain invasive seeds, it's likely the project will contribute to its spread. As such, the EAW must include a comprehensive management plan for invasive species with specific protocols on equipment cleaning, invasives monitoring, and rapid response strategies should invasives be found. In addition, the construction personnel would be trained in the identification and management of invasive species to effectively achieve the plan.

Timing for Construction Activities: The EAW indicated that the construction activities would be scheduled so as not to coincide with the critical periods like breeding or migration seasons of the concerned species. However, due to the tight schedule of the project, it is likely that the construction would be rushed hence the activities might be undertaken within the sensitive periods. This may impact local wildlife, including nest disruption or interference with migratory patterns. The EAW should address plans for possible delay or adjustment to the construction schedule and schedule work in a manner so that sensitive times of the year are avoided. Adaptation to circumstances as they present themselves is necessary so that wildlife may be protected.

Water Quality Monitoring: As noted in the EAW, stormwater discharges will be subject to the MPCA's NPDES/SDS permit program. However, it failed to provide enough detail on what the parameters to be monitored are and with what frequency. This might not allow for effective supervision of those aspects that may affect water quality and cause impairment in the aquatic ecosystem. For example, ignoring the monitoring of significant parameters such as turbidity, nutrient, or contaminant levels may risk release of any substance into the water from the proposed project, adversely impacting a certain population of fish or mussel. The EAW should include a comprehensive water quality monitoring program that identifies parameters to be monitored, their frequency, and mitigation measures to be taken when the limits are exceeded. Real-time monitoring and public reporting of the water quality data should also be considered, which would ensure accountability in this area.

Post-Reclamation Plans: General post-reclamation plans of the EAW include the development of a deep-water lake and the upland areas as native vegetation, but these have not been worked out in great enough detail regarding design, timeline, and success criteria to determine how habitat might effectively be reestablished to provide suitable support for the wildlife. The plan for reclamation should be more complete,

stating specific activities along with timelines and well-defined criteria for success. Ongoing monitoring and maintenance to ensure that the reclaimed areas achieve ecological sustainability in the long term need to be provided within the EAW.

Climate Change Considerations: Climate change is not adequately considered in the EAW, regarding how it might affect the effectiveness of the mitigation measures. Changes in precipitation could affect the amount available for dust control or to support vegetation during reclamation, and extreme weather events in the form of flooding or drought may increase erosion or impact both construction activities and post-reclamation success. A climate resiliency assessment should be done for the EAW to account for the possible climate-related hazards to the project itself and the involved ecosystems. On this basis, Holcim should look for ways of enhancing the resistance of the project and other ecosystems to the impact of climate change through adaptive management that will ensure whatever mitigation done is durable.

Local Land-Use Conflicts: Although the EAW has mentioned that the proposed land use is in concert with Grey Cloud Township's future plans, it has not considered strongly potential conflicts with present land use and/or community concerns. Increased traffic, noise, and dust due to quarry operations could be an issue related to local opposition and project implementation. Public concerns or other concerns might also be minimized through direct one-on-one contact between Holcim and the local people via public meeting and consultations. Pre-identify possible issues to proactively work out. Such community-related section in EAW, in turn, must demonstrate an integration of all public feedback for further planning so as to ensure that local peoples' concerns necessarily get full attention.



January 17, 2025

Holcim Larson Quarry EAW Review
Zoning and Land Use
Department of Public Works
Washington County
11660 Myeron Road North
Stillwater, MN 55082

RE: Community Vitality and the Availability of Aggregates

To whom it may concern:

The vitality of Minnesota's communities relies on local access to quality aggregate sources. The social, economic, and environmental health of our State requires construction aggregates to build and maintain our schools, places of worship, hospitals, affordable homes, transportation infrastructure, utilities, and much more. It is estimated that 8 tons of aggregates are required per Minnesotan per year to maintain our way of life. In the seven-county metropolitan area, with a population of 3.7 million people, this would mean that we would need about 30 million tons of aggregates every year.

Minnesotans need aggregates and yet, our supply in the metropolitan area is diminishing with every passing day. In the year 2000, the Minnesota Geological Survey (MGS) estimated that aggregate resources in the metro area had declined by 70%. Moreover, MGS estimated that metro aggregate resources would be exhausted by the year 2029. There is no question that the metro needs aggregates and that the supply is strikingly limited.

One must also recognize that it is essential to all broader societal needs to access aggregates as close as practical to their place of use. The cost to transport aggregates escalates rapidly with distance, such that deliveries further than 20 miles quickly become cost prohibitive. In addition to minimizing economic costs, aggregates sourced close to project sites also reduce greenhouse gases associated with transport. By minimizing the long-distance import of aggregates, we reduce the vehicle miles traveled on Minnesota roadways, which in turn reduces the overall impact on our infrastructure and environment. Looking to sources other than those currently in use, is more costly in both economic and environmental terms.

The essential nature of locally available construction materials is one that is being raised at all levels of society. At the state level, Minnesota's Office of the Legislative Auditor (OLA) recently completed an evaluation of Aggregate Resources. The OLA found that little has been done to protect and plan for the use of aggregate resources, despite the essential nature of access to aggregate resources.



At the national level, the 117th Congress passed the ROCKS Act to study, examine, and identify the means to access the aggregates that are necessary to infrastructure development. The ROCKS Act brings the State Geologic Surveys together with industry leaders to ensure smart policies that promote informed planning decisions. We see that, today, the entire country is recognizing the importance of making the best use of locally available materials.

Thank you for your attention to this important matter. Please don't hesitate to contact me with questions or comments.

Sincerely,

John C. Cunningham
Executive Director, ARM of MN

cc/ Tom Schmit, General Manager Aggregates, Aggregate Industries

Date 01-14-2025

To: Washington County Public Works

From: Richard Polta

The following are additional submittals to Holcims EAW I previously submitted.

Richard Polta

9600 Geneva Av So

Saint Paul Park, MN 55071

Rpolta100@gmail.com

This is an article from MN Post

Wastewater treatment plays large role in spread of Minnesota's PFAS contamination, report finds

by Mohamed Ibrahim

11/16/2023

A new report by the Minnesota Center for Environmental Advocacy (MCEA) shows wastewater treatment plays a large role in the widespread contamination of “forever chemicals” known as PFAS across the state.

In recent years, the Minnesota Legislature has passed some of the most robust legislation in the nation to help reduce how much PFAS makes it into the environment. But the report's findings suggest state lawmakers and officials will now need to go beyond laws aimed at reducing the chemicals' use and turn toward addressing PFAS that is already pervasive in the state's environment.

The report, released last week, was co-authored by the MCEA and Matt Simcik, an environmental health sciences professor at the University of Minnesota. It describes high levels of per- and polyfluoroalkyl substances, or PFAS, found in four waterways they tested over the summer: the Mississippi River, as well as the Sauk River, Clearwater River and Johnson Creek in central Minnesota.

According to their results, the highest concentrations of PFAS were found in the Mississippi River channel receiving water discharged from the Metro treatment plant in St. Paul.

Let it be noted the Metro Treatment Plant is located upstream from Upper Grey Cloud Island.

Since 2017 when the Grey Channel was opened to allow Mississippi River water to flow thru it. That created the condition where Upper Grey Cloud Island is completely surrounded by River water. This allows PFAS contaminated river water to be drawn into the Karst rock formation anywhere around the island. Dewatering a large amount of area on the island will result in river water flowing thru the rock formations to refill the areas dewatered.

Question: Based on the above information and other readily available information on PFAS in Wastewater. Natural precipitation is not enough to replace the amount of water removed thru the dewatering process. The proposed dewatering will now draw PFAS contaminated water from Contaminated ground water, and the contaminated Mississippi River.

What long term effect is this going to have on ground water used for drinking / residential wells on Upper Grey Cloud Island and surrounding areas?

What studies have been done since 2017, when the Grey Cloud channel was opened up to river flows regarding PFAS contamination now available from two different sources and the proposed dewatering?

Richard Polta

Date 01-14-2025

To: Washington County Public Works

From: Richard Polta

The following are my submittals to Holcims EAW submittal.

Richard Polta

9600 Geneva Av So

Saint Paul Park, MN 55071

Rpolta100@gmail.com

- Attachments C1, C2.1, C2.2, C3.1, C3.2, Figures 2-14, and possibly other attachments all show Holcims property extending to the East side of the Grey Cloud Channel. This doesn't match Washington County parcel viewer website. The website shows parcels on each side of the channel stopping at the water's edge not extending across the channel. My parcel description states the property extends east from the centerline of the channel. Other parcels east of the channel descriptions have the same description.

Property Address: 9600 GENEVA AVE S

GREY CLOUD ISLAND TWP, MN 55071 MAPS

Class: Residential

Legal Description: PT SE1/4 BEING THAT PT OF S 300FT OF N 600FT LYING E OF C/L OF GREY CLOUD CHANNEL EXC E 66FT & EXC A 33FT WIDE STRIP OF LAND DEEDED TO ARANCO OF MN IN BK 302 PG 547 SUB TO 66FT EASE TO MN PIPE LINE CO & SUB TO FLOWAGE EASE Section 24 Township 027 Range 022property viewer.

Question: Why the difference from what Holcim is showing compared to what property descriptions state?

- Site Plan Option 1realign CR 75 sheet # C2.1
Under this option Washington County Public Works has told Holcim and Grey Cloud Island Township if this option goes forward CR 75 would be turned over / forced onto the Township. Township would own the road and be responsible for all maintenance, repair, and replacement costs. This would be the entire length of CR 75 not just the section going around the mining operation. Currently the Township incurs no costs related to CR 75.

Question: Being the road realignment would be done solely at Holcims request and benefit. Would Holcim reimburse the Township for the added cost to the township to maintain the entirety of CR75 in perpetuity?

- Site Plan Option 2 bridge / underpass to quarry sheet # C2.2
Under this option a bridge will be built which needs periodic inspections, maintenance, and eventually replacement. These will be ongoing cost forever unless the bridge is removed and filled in.

Question: Being the bridge option is requested and built solely for Holcims benefit. Will Holcim reimburse Washington Counties costs to inspect, maintain, and replace the bridge when needed in perpetuity?

- Page 4 Operations Overview.
The majority of the processed material is currently and will continue to be transported via barge up the Mississippi River to the company's distribution yard in St. Paul. Some material will also be trucked out on CR 75, depending upon the demand of local projects.

Question: To state some material will be trucked on CR 75, doesn't give real numbers. Grey Cloud Township residents continuously file complaints on trucking noise and the number of trucks coming out of the Larson plant. Most residents agree the number of trucks from the plant has increased year after year. What % of material will be trucked verses hauled by barge? Actual truck numbers, and tonnage numbers need to be provided. Historically and future.

- Page 4.

Mining Methods

The expansion area will be mined utilizing the same methods used at the existing Larson Quarry. The quarry is dewatered, which lowers the groundwater table within the limestone deposit to allow removal of the limestone using dry mining methods. Trees are removed in phases as areas are prepared for mining. Topsoil and overburden are removed and used to create screening berms and safety berms. The berms are seeded and mulched, and vegetation is established to reduce the potential for erosion. The material used to construct the screening berms may eventually be used in reclamation activities.

MRCCA regulations require: New and, where practicable, existing nonmetallic mining operations must not be readily visible and must be screened by establishing and maintaining natural vegetation. The unscreened boundaries of nonmetallic mining areas are limited to only the barge loading area.

Question: It takes a berm and natural vegetation to screen the mined area. This is the reason for the berms in the first place to screen the mining or mined area. Removing the berms to use the material elsewhere now leaves the mine non screened. If the material used to construct the screening berms is used in reclamation activities. How would the existing nonmetallic mining operations be not visible?

- Page 5.

The quarry operates seasonally, typically from late March through November each year. The main processing plant is located approximately three quarters of a mile to the southwest of the expansion area and operates in conformance with the hours permitted by Grey Cloud Island Township. The approved operating hours for the 2023 and 2024 mining seasons were from 6:00 a.m. to 10:00 p.m., Monday through Friday and 7:00 a.m. to 12:00 p.m. on Saturdays.

Comment: This statement is misleading and should be corrected, as the approved operating hours in Holcims 2024 annual permit were 7 AM to 7PM. Holcim was only allowed to operate till 10 PM by special permission from the Town Board. This section should state the actual facts stating how hours were approved.

- Page 5-6: Plan Sheet C2.1 - Site Plan Option 1 illustrates the conceptual site layout of the road relocation option. The final alignment will be subject to future input from the County and Township. The plan sheet identifies the locations of adjacent homes, driveways and property lines with respect to the proposed realignment. As shown on Plan Sheet C2.1, minor modifications to an existing private driveway easement through the expansion area will be necessary to provide access from the new road realignment to three homes

located southeast of the expansion area. Access to all other residents will not be impacted. The existing Larson Quarry site access will not be impacted and a new site access to the east will not be needed. The eastern reserves will be accessed by progressive quarry activity from the existing eastern quarry limits moving to the east. Extraction and transfer of material from the active quarry face to the processing area would occur at recessed elevations well below the surrounding grade.

Question: How can the statement be made that extraction and transfer of material will be made at recessed elevations well below the surrounding grade when the mining operation starts at grade level and possibly includes 53-70 acres? And what is (well below surrounding grade)?

- Page 6.

CR 75 is a rural two-lane roadway with no turning lanes, sidewalks, or trails. Based on Minnesota Department of Transportation (MnDOT) 2018 traffic count data, the segment of CR 75 proposed for relocation has an annual average daily traffic (AADT) volume of 1,550 with a posted speed of 40 mph.

Comment: Traffic count data needs to be updated as the data stated from 2018 is going on 7 years old. Local residents have all stated every year there has been an increase in traffic in the Grey Cloud area. Do we have actual current data. Washington County did do traffic studies in the area of the Town Hall in the past year or two.

Question: How do Current County traffic numbers compare to the numbers Holcim quoted?

- Page 7.

Since road realignment represents a relatively small section of road and does not include any new connections, the average daily traffic volume is not expected to change current traffic patterns or volumes. Washington County has jurisdiction for CR 75, therefore, any plans to modify the road would require coordination with and approval from the County.

Comment: Plans to modify CR75, or build additional roads all require approval from the Township as well as the County, not just the County.

- Page 8.

The bridge will be located near the middle of the western mining limits of the expansion area, (Plan Sheet C2.2 Site Plan Option 2.) Construction of the bridge will involve a temporary relocation of County Road 75 and utilities around the eastern portion of the construction area. The existing roadway will be removed within the construction area. Limestone will be removed through a corridor running from the existing eastern limits through the 200-foot setback area west of CR 75, through the CR 75 R-O-W and through the 200-foot setback area on the east side of CR 75.

Comment: The 200-foot setback area on the east side of CR 75 is incorrect. As current township ordinance 49.3 requires a 500-foot setback of mining operations from any road right of way.

- Page 8.

The construction of the bridge will require a temporary detour for an estimated three to five years to allow time to create the underpass, staging area, and build the bridge.

Question: The estimated time to build the proposed bridge is extremely long. This should be able to be completed in less than one construction season. The new bridge on CR 75 over the Grey Cloud Channel was completed in less than one year and involved the same or more building constraints, including water, sheet piling, etc. Why would this bridge take so long to build?

- Page 7.

Question: How would option 2 to build a bridge over CR 75 meet MRCCA requirements 6106.0110 sub5.d: New and, where practicable, existing nonmetallic mining operations must not be readily visible and must be screened by establishing and maintaining natural vegetation. The unscreened boundaries of nonmetallic mining areas are limited to only the barge loading area;

- Page 8.

Reclamation

Reclamation of the Larson Quarry will be performed upon conclusion of mining activity. The intent of reclamation is to leave the site in a stable condition, minimize the potential for erosion, and establish site conditions that allow for future development of the land. Plan Sheets C3.1 and C3.2 illustrate the reclamation condition of the existing quarry and expansion area and include information on the approximate site elevations upon completion of reclamation grading.

Question: How does this limited description on land reclamation, and statement “reclamation will be performed upon the conclusion of mining” satisfy the requirements of MRCCA rules 6106.0110 F. existing and new nonmetallic mining operations must submit land reclamation plans to the local government compatible with the purposes of this chapter.

Question: MRCCA rules 6106.0110 require you to explain where staged reclamation may occur at certain points during the life of the site; What is the plan for staged reclamation?

- Page 17:
Chart shows a loss of 43 acres of wooded land being removed for option #2, and 79 acres being lost under option #2.

Question: how does this removal of vegetation comply with MRCCA rules

6106.0150 VEGETATION MANAGEMENT STANDARDS.

Subpart 1. Purpose. The purpose of this part is to establish standards that:

- A. sustain and enhance the biological and ecological functions of vegetation;
- B. preserve the natural character and topography of the Mississippi River Critical Corridor Area; and
- C. maintain stability of bluffs and steep slopes and ensure stability of other areas prone to erosion.

Subp. 2. Applicability. This part applies to:

- A. shore impact zones;
- B. areas within 50 feet of a wetland or natural drainage way;
- C. bluff impact zones;
- D. areas of native plant communities;* and
- E. significant vegetative stands identified in local governments' adopted plans.

Subp. 3. General provisions.

A. Intensive vegetation clearing is prohibited, except for the following activities, which are allowed by local permit:

- Page 19: chart shows Unit of Government for approval Washington County. Approval of CR 75 Relocation Plans including memorandum of understanding/developer's agreement (for Option 1) and Approval of CR 75 bridge plans, temporary reroute and limited use permit for right of way crossing (for Option 2). Both these items require Township approval.

- Page 19:

Because the Project is an expansion of the existing quarry and the expansion area has already undergone environmental review, many of the required permits have been issued. Some of the existing permits will require a permit amendment or reissuance as noted below.

Question: How can the project be considered an expansion of an existing quarry? As the proposed mining area is not zoned for mining, hasn't been mined, and is blocked off from the existing mine by a County Road. This should be considered a new mine requiring zoning approvals, operating conditions, reclamation planning, Township approval, County approval, meet MRCCA rules, etc?

- Page 20:

Land use:

Describe:

Existing land use of the site as well as areas adjacent to and near the site, including parks and open space, cemeteries, trails, prime or unique farmlands.

Grey Cloud Island Township is characterized as a semi-rural community. The existing land use of the Project Area is predominantly idle woodland and pastureland/grassland that has been held in reserve by Holcim for more than 50 years. Land use adjacent to the Site includes the existing CR 75 roadway and existing Larson Quarry immediately to the west of CR 75. The Grey Cloud Channel borders the Project Area to the north and east, and the remaining area near the Project Area includes open space, residential and agricultural land uses. There are approximately 12 residences located between 600 and 1,000 feet from the proposed mining limits. The existing Larson Quarry is the only full-time employer within the community. Figure 4 - Existing Land Use illustrates existing land use of the expansion area and in the vicinity of the Site.

Question: Complaints from blasting have been made from residents as far away as 8000 feet from the mining operation. (South end of Summitt Ave

in Saint Paul Park), and 7500 feet from (Cottage Grove residents in the Mississippi Dunes) neighborhood. The proposed mining area will put approximately 50 homes less than 3000 feet from the mining operation, and the majority of those homes are less than 2000 feet from the mining operation. And there are approximately 100-150 which have felt effects from blasting. To be fully transparent if the applicant is listing distances from mining to homes why doesn't the applicant list the number of homes and distance from mining for all homes in the area which have felt the effects from blasting?

- Attachment #5 Nearby Residential Well Information.

This chart should be updated and all information gathered. There is no date on the table, and wells may have been modified since the table was created. There are too many sections of the chart marked "null". To truly tell the effects any additional dewatering may have on area wells, information before any dewatering takes place, and then during dewatering operations, not just after the fact. To wait just creates estimates, assumptions, and unanswered questions on dewatering effects.

Comments / Questions on dewatering.

1. Page 32 of the attachment's states:

Karst features can include a network of fractures and solution cavities that create high flow systems that affect groundwater flow and contaminant transport. Faster and more variable contaminant transport may occur in karst terrain than in a more homogeneous non-karst terrain. Karst features may also allow direct pathways for contaminants to reach underground aquifers from the surface. The Project involves both dewatering and removal of the karst prone bedrock. The dewatering activity changes the direction of groundwater flow in the immediate vicinity of the mine. This eliminates the potential for contaminant transport from the mine off-site but increases the potential for contaminant transport from off-site sources to the mine.

2. Page 50 of the attachment's states:

Dewatering at the Site has the potential to draw groundwater towards the

site influencing groundwater flow directions and gradients in the immediate vicinity of the Quarry. Because the quarry is situated adjacent to the Mississippi River, the regional direction of groundwater flow in the area surrounding the site remains east to west-southwest towards the discharge area of the Mississippi River. With no Project, groundwater from the Prairie du Chein Aquifer discharges to the Mississippi River. With the Project, groundwater is ultimately discharged to the river as well, although some of the groundwater gets intercepted by the dewatering operation prior to reaching the river. This groundwater is treated in a sedimentation basin and then discharged into the river. The quarry is not a source of PFAS, and the Project will not impact the existing regional PFAS contamination. The Project will follow state rules and guidance as they are developed through MPCAs PFAS Blueprint and continued work in addressing and cleaning up existing PFAS contamination.

3. Page 38 of the attachment's states: The Mississippi River is an MPCA 303d impaired water located within one mile of the Site. This river segment has an EPA-approved impairment for: Aluminum; Fecal coliform; Mercury in fish tissue; Mercury in water column; Nutrients; PCBs in fish tissue; Perfluorooctane sulfonate (PFOS); Perfluorooctane sulfonate (PFOS) in fish tissue; Total suspended solids (TSS).²⁰ These impairment(s) are considered to be construction related parameters, which are the parameters of concern associated with aggregate mining facilities.

4. MPCA PFAS well monitoring maps show a direct path of PFAS contamination coming from the Woodbury dump site directly to the Upper Grey Cloud Island area. Talking with staff from PFAS meetings, they said there is a gap in the well monitoring data in the straight line between the Woodbury dump site and Upper Grey Cloud Island due to very few wells to monitor. As most of the area is served by city water. MPCA staff commented if you draw a line from the Woodbury dump site to Upper Grey Cloud Island, wells on each side of that line indicate contamination. The farther from that line going NW and SE contamination in wells show less contamination. Data provided states the site has the potential to draw ground water towards the site influencing ground water flow directions and gradients in the immediate vicinity of the quarry.

5. The dewatered level of the quarry is stated to be approximately 50 feet lower than the normal pool level of the Mississippi River.

6. The new bridge on CR 75 was open to river flow thru the channel in 2017. Fall of 2017 a residential well on Pioneer Road became contaminated with Fecal Coliform bacteria. This well had been in service since the 1960 time with no problem. Also, the Metropolitan Waste Control Commission does not chlorinate its Metro Plant effluent discharge during winter months. No doubt the non-chlorinated Treatment plant discharge is flowing from the Mississippi River, thru the Grey Cloud Channel, thru rock formations, to the effected well.

7. As proposed the quarry will be dewatered to a level of approximately 50 feet lower than normal Mississippi River level. This creates about 20 PSI of differential pressure from the river level to the quarry bottom.

8. The current size of the mine, and proposed additional mining areas being dewatered leaves a reduced area for natural precipitation to replenish natural groundwater. This ends up being natural groundwater is being replaced by polluted Mississippi River and Grey Cloud Channel water. It is a know fact that the existing 5 monitor wells water level, follows river water level. As the river level rises so does the water level in the 5 monitoring wells. When the river level drops so do the water levels in the 5 monitoring wells.

Questions: Taking into consideration the 8 previously listed items.

- With the 50-foot differential of river water level to the dewatered mine floor this creates a perfect condition where polluted river water is drawn thru the fractured Karst rock formations toward the mine. This has already happened in the area by Pioneer Road. As a well was contaminated with Fecal Coliform from the Grey Cloud Channel. As the proposed mine expands, more water will be drawn from all sides of the mine. Data in the attachments supplied show Monitoring Well #5 will have a drawdown of 24.2 feet. Any ground water pumped out, will naturally be replaced by

water from areas outside the mine pit. Geography of the area strongly suggests this replace water will come from the Mississippi River and Grey Cloud Channel.

Question: How do we know polluted river water be drawn in from the river won't contaminate the entire Karst formation in the area?

Question: What will be the long-term effect as continued dewatering naturally creates a path for river water to flow into the Karst formation in the area?

- With the 50-foot differential of river water level to the dewatered mine floor this creates a perfect condition where polluted river water is drawn thru the fractured Karst rock formations toward the dewatered mine.

Question: How can the public be assured the proposed dewatering won't increase the already know PFAS water contamination problems, or create additional problems?

- With the increased size of the dewatered mine, and proposed size of the mine increasing. There is less area for natural precipitation to replenish natural groundwater.

Question: Without natural precipitation being able to keep up with dewatering flow rates how does this affect water quality, and the water table to replenish itself in the area?

- The Mississippi River is an MPCA 303d impaired water located within one mile of the Site. Knowing the water pumped out of the mining site will naturally try to replace itself with ground water from all directions. And with the fractured rock in the area, much of that water will come from the Grey Cloud Channel and Mississippi River.

Question: With the Mississippi River and Grey Cloud Channel being a known source of impaired water. How will this effect ground water quality in the area?

- The Grey Cloud Channel was opened up to flows from the Mississippi River in 2017.

Question: was the degraded / polluted water quality in the Grey Cloud Channel since 2017 considered in data included in the current EAW?

Submitted

Richard Polta



Fwd: Holcim permit on Grey Cloud Township

From Joan Miller <joanm8898@gmail.com>
Date Fri 2025-02-07 9:58 AM
To Daniel Elder <Daniel.Elder@washingtoncountymn.gov>

External message alert: This message originated from outside the Washington County email system. Use caution when clicking hyperlinks, downloading pictures or opening attachments.

Sent from Gmail Mobile

----- Forwarded message -----

From: **Joan Miller** <joanm8898@gmail.com>
Date: Thu, Jan 16, 2025 at 9:21 PM
Subject: Holcim permit on Grey Cloud Township
To: <PublicWorks@co.washington.mn.us>

My name is Joan Miller and I live at 8898 Grey Cloud Island Drive south. Grey Cloud Township. I don't believe that Holcim should be able to have the variance or very mine this area. This permit has been open for three years now and in the initial permit, they did not include a variance. It is my understanding that they just added onto it recently.

I do not agree that they should be able to mine 500 feet from the two properties indicated on report. Ordinance 49.3 was adopted May 8 2024 was amended to supersede the prior ordinances. It states that no mining stockpiling and land distribution shall take place within 500 feet of adjoining property lines not structures.

The mining company should have some respect for the two property owners, the new property owners. They had nothing to do or were told about the agreements made before they bought their homes. I am sure that they would not have purchased their homes because the resale value and having the mind in your backyard. They were told by the Town Board and by the mining company everything was going be OK and that they had nothing to worry about which was a lie so why should these people have to pay the consequences for the previous owners and the previous members of the town board.

There was a poster up at the open hearing saying that no harm will come to the environment by mining in the northern section. How can that be statement be true, if you take down a grove of trees and wild grasses that is making a difference in the environment. How do you think the wild life will exist? You take down trees, you strip the land of everything that's green and viable and you don't think that that is hurting the environment. Why do they have to strip the land so totally of The mining company is I feel trying to drain the spirit of Grey Cloud Island and strip it dry of all of its soul. Maybe past residents/town board members made mistakes making deals with the mining company. Maybe these people were naïve and didn't think about the consequences, but this is 2025 reality is we can't

keep taking from the earth and we need to respect your fellow man. Tonya and Jeff spoke at a meeting, and Tonya asked the members from Holcim mine "How would they like to have this happening 500 feet from a structure of their home. The lawyer couldn't even raise his eyes to look at her. Things were done wrong and they need to be set correct. Again should these people suffer when they were not made aware of these deals and in one case they were told everything was gonna be all right don't worry about it? Somebody (the mining company and the township) needs to make it right with these homeowners because they are going lose a big investment on their homes.

How could they sell the property?

Hours of excavation. These hours need to be cut down at least to 7 to 5 Monday through Friday and because they are so close to residents of Grey Cloud.

Thank you for your time.

Sent from my iPhone