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Laurentian Taconite Mine

FINAL ENVIRONMENTAL IMPACT STATEMENT

MINNESOTA DEPARTMENT OF NATURAL RESOURCES

AUGUST 1990



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STATE OF
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10

DATE: September 20, 1990

TO: Final EIS Distribution List Parties
Other Interested Parties

FROM: Thomas W. Balcom, Supervisor *T.W.B.* **PHONE:** (612)296-4796
Natural Resources Planning and Review Services

SUBJECT: Proposed Laurentian Taconite Mine
Final Environmental Impact Statement (EIS) Adequacy Decision

The Department of Natural Resources (DNR) has issued an Adequacy Decision on the Environmental Impact Statement prepared for the proposed Laurentian Taconite Mine near the City of Gilbert in St. Louis County, Minnesota. The DNR has determined that the Final EIS is adequate. The attached Adequacy Decision outlines the justification for this decision.

A public notice of this decision will be published in the EQB Monitor.

Attachment

ISMC/rodmemo

STATE OF MINNESOTA
DEPARTMENT OF NATURAL RESOURCES

RECORD OF DECISION

In the Matter of the Final
Environmental Impact Statement (EIS)
for the Laurentian Taconite Mine Project
Proposed by Inland Steel Mining Company
St. Louis County, Minnesota
Pursuant to Minnesota Rules part
4410.2800 (1989)

**FINDINGS OF FACT,
CONCLUSIONS,
AND ORDER**

Based upon and after having considered the entire record of the proceeding, including written reports, written and oral data, information, and statements, the Department of Natural Resources makes the following:

FINDINGS OF FACT

1. The preparation of an Environmental Impact Statement (EIS) is required to comply with the rules of the Minnesota Environmental Quality Board (EQB) for the construction of a new facility for mining metallic minerals (Minnesota Rules part 4410.4400 subpart 8). The Department of Natural Resources (DNR) is the Responsible Governmental Unit (RGU) for the EIS.
2. The Final EIS shall be determined adequate if it : (a) addresses the issues raised in the scoping process so that all issues for which information can be reasonably obtained have been analyzed; (b) provides responses to the substantive comments received during the Draft EIS review concerning issues raised in the scoping process; and (c) was prepared in compliance with the procedures of the Minnesota Environmental Policy Act and the EQB's Environmental Review Program rules (Minnesota Rules part 4410.2800, subpart 4).
3. The proposed Laurentian Taconite Mine is a proposal of Inland Steel Mining Company to construct a 1,200-acre taconite mining facility near Gilbert, Minnesota, which would include an open pit taconite mine, lean ore and waste rock stockpiles, a service facility, and a haul road to Inland's Minorca taconite processing facility at Virginia, Minnesota.
4. Environmental review of the proposed project was initiated in 1989 with the preparation by the DNR of a Scoping Environmental Assessment Worksheet (EAW) and Draft Scoping Decision document which identify issues to be addressed during the EIS process.
5. A notice announcing 1) the availability of the Scoping EAW and Draft Scoping Decision, and 2) a 30-day scoping period, was published in the EQB Monitor on August 7, 1989.
6. A press release announcing the scoping period and the availability of the scoping documents was supplied to at least one newspaper in the vicinity of the proposed project. The Scoping EAW and Draft Scoping Decision document were sent to all parties on the Environmental Quality Board's EAW Distribution List and to other interested persons.

7. The Draft Scoping Decision identified the following issues to be addressed in the EIS: water appropriations, including quantity, surface flows, and groundwater conditions; water quality; noise; air quality, including fugitive dust; fish and wildlife resources; and socioeconomic effects.
8. A public scoping meeting was held on August 30, 1989, in Gilbert, Minnesota. The public scoping period concluded September 6, 1989. The Draft Scoping Decision was modified to reflect comments received during the public scoping period.
9. The DNR issued a Final Scoping Decision document in November 1989. A copy of the Scoping Decision document was sent to all parties who had received a copy of the Scoping EAW, or who had requested a copy of the Scoping Decision document. An EIS preparation notice, including a summary of the Scoping Decision was submitted to the EQB and was subsequently published in the EQB Monitor on December 11, 1989. A press release announcing the EIS preparation notice and summarizing the Scoping Decision was supplied to at least one newspaper in the vicinity of the proposed project.
10. No evidence exists in the record to indicate that any person objected to the scope of the EIS as proposed in the Scoping Decision document.
11. The Scoping Decision Document contains the required content specified in Minnesota Rules part 4410.2100, subpart 6, including issues to be addressed in the EIS, a description of issues that would not be addressed in the EIS, the alternatives to be addressed in the EIS, and identification of studies to be undertaken.
12. The topics identified in the Scoping Decision for evaluation and study, as well as additional topics included in the Draft EIS are identified in Findings 13 to 20 by underlining.
13. The purpose of the Draft EIS. This topic is addressed on page 1-1 of the Draft EIS.
14. An identification of governmental permits, licenses and approvals required for the proposed project as well as information on the governmental unit responsible for each action. Governmental approvals are listed in Section 2 of the Draft EIS.
15. A description of the No-Build and the Proposed alternatives. These alternatives are described in pages 3-1 to 3-11 of the Draft EIS.
16. A brief description of other alternatives considered but eliminated from further consideration scoping, and the reasons for their elimination. This topic is addressed in pages 3-12 to 3-14 of the Draft EIS.
17. A description of the existing conditions in the project area, in terms of: ground and surface water quality and quantity, noise, air quality (limited to fugitive dust), vegetation and wetlands, fish and wildlife resources, and socioeconomic conditions. Existing conditions are described in Section 4 of the Draft EIS.
18. A description of project construction impacts to ground and surface water quality and quantity, noise levels, air quality (limited to fugitive dust), vegetation and wetlands, fish and wildlife resources, and socioeconomics. Project construction impacts are addressed in Section 5 of the Draft EIS.

19. A description of project operation impacts to ground and surface water quality and quantity, noise levels, air quality (limited to fugitive dust), vegetation and wetlands, fish and wildlife resources, and socioeconomics. Project operation impacts are addressed in Section 5 of the Draft EIS.
20. A description and evaluation of measures to mitigate or lessen project impacts to ground and surface water quality and quantity, noise levels, air quality (limited to fugitive dust), vegetation and wetlands, fish and wildlife resources, and socioeconomics. Impact mitigation is addressed in Section 6 of the Draft EIS.
21. The EQB rules governing environmental impact statements require the discussion of impacts in an EIS to "be a thorough but succinct discussion" and "shall concentrate on those issues considered to be significant as identified by the scoping process". (Minnesota Rules part 4410.2300, item H.)
22. The Draft EIS addresses the issues raised in the scoping process and for which information reasonably could be obtained.
23. On June 21, 1990 the Draft EIS was distributed to parties on the official EQB distribution list, to all persons sent a copy of the Scoping EAW or Scoping Decision document, and to all persons who requested copies of environmental documents concerning the project proposal. Copies were placed in three public libraries. Copies of the Draft EIS and other supporting documents also were provided to the public review locations at the DNR Central Office and the DNR Division of Minerals Hibbing Office.
24. A notice of availability of the Draft EIS was published in the EQB Monitor on June 25, 1990. A press release announcing the availability of the Draft EIS, the public review locations, and information concerning the public meeting and the review and comment period was issued to at least one newspaper of general circulation in the vicinity of the proposed project. A copy of the Draft EIS also was provided to any person requesting one.
25. A public meeting to receive comments on the Draft EIS was held on July 16, 1990 at the Gilbert City Hall, in Gilbert, Minnesota. At least 42 people attended the meeting as noted by attendance sheets circulated by the DNR.
26. Copies of the Draft EIS were made available at the Draft EIS public meeting. Persons attending the meeting also were provided with an agenda listing the individual presentations to be made, an expanded table of contents from the Draft EIS, which identified each item discussed in the Draft EIS, forms that could be used for submitting written comments, and a copy of the Draft EIS Summary. Comments presented at the public meeting were reflected in the Final EIS.
27. The Draft EIS public comment period concluded July 30, 1990.
28. Seventeen letters of comment, including 65 specific comments, were submitted. These letters are reproduced in the Final EIS document in Section 3.1.

Comments or questions presented orally at the public meeting were summarized in the Final EIS document in Section 3.2. These comments concerned the topics of haul road alignment alternatives, impacts due to blasting, road access to the City of McKinley, a proposed runoff diversion berm near the Corsica Pit, and potential dust and noise impacts due to stockpiling.

29. The Draft EIS and the Final EIS documents constitute the entire Final EIS. The DNR made revisions to the Draft EIS in response to or as warranted by certain comments and has presented these revisions in Chapter 2.0 of the Final EIS document. The topics addressed by these revisions are: economic data for the Minorca taconite mine and plant; population information for the City of Gilbert; elevation-duration data for White Lake; and wetland mitigation strategies.
30. The DNR has responded to each of the comments on the Draft EIS, received during the public review and comment period, in Chapter 3.0 of the Final EIS document. The responses are presented in a format that facilitates cross-referencing between each comment and its respective response.
31. Timely and substantive comments on the Draft EIS concerning issues raised in the scoping process have been addressed in detail in the Final EIS.
32. Comments reflecting opinions on the merits of the project proposal or recommendations regarding the selection of one or more alternatives were provided a response. The response acknowledged the comment and emphasized that comments related to the merits of the project or to the selection of alternatives, while not within the purview of the Final EIS, would be referred to applicable regulatory authorities through publication of the Final EIS document.
33. One comment letter was received after the July 30 close of the comment period. The EQB environmental review program rules require that the Final EIS include responses to all timely and substantive comments on the Draft EIS (Minnesota Rules 4410.2700). This letter (from the U.S. Environmental Protection Agency) was received by the DNR on August 27, 1990. As such, it was not timely for purposes of the EQB rules and thus did not require a response in the Final EIS. The comment letter has been referred to the project proposer, for consideration in project design and permit application decisions.
34. Comments dealing with issues outside or beyond the scope of the Scoping Decision and Draft EIS were provided a response in the Final EIS document. The response in Chapter 3.0 explained why the issue was beyond the established EIS scope, whether a substantive response was provided in the Final EIS document, and whether any revisions to the Draft EIS or additional or expanded information had been provided as a component of the Final EIS. No substantive comments or arguments were submitted to warrant any modifications to the established EIS scope.
35. The Final EIS was distributed on August 29, 1990 to all parties who received the Draft EIS and to any party who requested a copy. Copies were placed in three public libraries. Copies of the Final EIS were also provided to the public review locations at the DNR Central Office and the DNR Division of Minerals Hibbing Office.

36. A Notice of Availability of the Final EIS and of the opportunity for public comment on the adequacy of the Final EIS was published in the EQB Monitor on September 3, 1990. A press release announcing the availability of the Final EIS, the public review locations, and the opportunity for public comment on the adequacy of the Final EIS was issued to at least one newspaper in the vicinity of the proposed project. An information letter transmitted with the Final EIS document identified the three criteria from the EQB rules (Minnesota Rules part 4410.2800, subpart 4) to be used in the Determination of Adequacy.
37. Written comments on the adequacy of the Final EIS were accepted following distribution of the Final EIS document from September 3, 1990 through September 17, 1990. One comment letter was received.
38. Mr. Thomas J. Juth submitted written comments indicating his pleasure that in the Final EIS document Haul Road Alignment Alternative #3 had been abandoned and that Haul Road Alignment Alternative #5 had been introduced, and commending DNR staff performance during EIS preparation and review.
39. Regarding Mr. Juth's comments on the two haul road alignment alternatives, these alternatives are discussed in Final EIS Section 2.4, which includes revisions to Section 6 (Mitigation Strategies) of the Draft EIS, and Final EIS Section 3.1.13 which responds to Mr. Juth's comment letter on the Draft EIS. Haul Road Alignment Alternative #3 has not been "abandoned" as indicated by Mr. Juth. The Final EIS discusses a variety of factors that would have to be considered before a final haul road alignment could be selected, including that Haul Road Alignment Alternative #3 would likely conflict with State mineland reclamation rules. Haul Road Alignment Alternative #5 is introduced in Final EIS Section 2.4 as a possible wetlands impact mitigation strategy.
40. Regarding Mr. Juth's commendation of DNR staff performance, the DNR notes and appreciates this comment.
41. The public has been offered opportunities for input into the scope of the EIS, the content of the Draft and Final EISs, and the adequacy decision on the Final EIS in accordance with all applicable provisions of the EQB's Environmental Review Program rules.
42. The EIS document meets the content requirements of Minnesota Rules part 4410.2300, including a cover sheet, summary, table of contents, list of preparers, project description, governmental approvals, alternatives, environmental, economic, employment, and sociological impacts, mitigation measures, and appropriate appendices.
43. The EIS provides an evaluation and analysis of effects and alternatives, which is commensurate with their importance as identified by the scoping process, and identifies reasonable mitigative measures and requirements for identified adverse effects.
44. The Final EIS has been prepared in accordance with the procedures of Minnesota Statutes, section 116D.04 (1988) and Minnesota Rules part 4410.0200 to 4410.6500 (1989).

45. Minnesota Rules 4410.2800 subpart 3 require the Determination of Adequacy of the Final EIS to be made at least ten days after publication in the EQB Monitor of the notice of availability of the Final EIS, and within 280 days after the EIS preparation notice was published in the EQB Monitor.
46. Minnesota Rules 4410.2800, subpart 1 specify that the RGU (the Department of Natural Resources) shall determine the adequacy of the Final EIS unless notified by the EQB that the EQB will determine the adequacy. The EQB shall notify the RGU no later than 60 days following publication of the preparation notice in the EQB Monitor. The EQB has not given such notification to the DNR.
47. The EIS identifies three permits to be issued by the DNR for the proposed Laurentian Taconite Mine. Minnesota Statutes section 116D.04 subd. 9, provides for EQB review of any state project or action significantly affecting the environment or for which an EIS is required. Minnesota Rules 4410.3200 subpart 2 require the DNR (and any other state agencies with permit authority over the project) to provide at least seven working days notice to the EQB of its intention to issue any such permit. The DNR has provided the required notice to the EQB, including: a brief description of the project; the date the permit is expected to be issued; the title and date of EISs prepared on the project; and the name, address, and phone number of the project proposer and parties to any proceeding on the project.
48. Officials responsible for the issuance of permits for natural resources management and development shall give due consideration to the provisions and policies of Minnesota Statutes, sections 116D.01 to 116D.06 (Minnesota Statutes 116D.04, subdivision 7, and 116D.06, subdivision 2).

CONCLUSIONS

1. The Department of Natural Resources has the authority to determine the adequacy of the Final Environmental Impact Statement for the proposed Laurentian Taconite Mine.
2. The Department of Natural Resources has fulfilled the procedural requirements relating to the determination of adequacy.
3. The Final EIS for the proposed Laurentian Taconite Mine is adequate because it meets the criteria set forth in Minnesota Rules part 4410.2800 subpart 4, which require that it:
 - a. address the issues raised in scoping so that all issues for which information can be reasonably obtained have been analyzed;
 - b. provide responses to the substantive comments received during the draft EIS review concerning issues raised in scoping; and
 - c. be prepared in compliance with the procedures of the Minnesota Environmental Policy Act, and Minnesota Rules parts 4410.0200 to 4410.6500.
4. That any Findings that might properly be termed Conclusions and any Conclusions that might properly be termed Findings are hereby adopted as such.

ORDER

Based on the Findings of Fact and Conclusions contained herein and the entire record of the proceeding:

The Department of Natural Resources hereby determines that the Final Environmental Impact Statement for the Proposed Laurentian Taconite Mine is adequate.

Approved and adopted this 18th day of September, 1990.

STATE OF MINNESOTA
DEPARTMENT OF NATURAL RESOURCES



JOSEPH N. ALEXANDER
Commissioner

Final Environmental Impact Statement for the Laurentian Taconite Mine Gilbert, Minnesota

**Responsible
Governmental Unit**

Minnesota Department of Natural Resources

Contact Person

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Proposer

Inland Steel Mining Company

**Proposer's
Contact Person**

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P.O. Box 1, U.S. Highway 53 North
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(218) 749-5910

Abstract

This document provides responses to public comments and information revising the Draft EIS. This document, together with the Draft EIS, constitutes the Final EIS. The EIS discusses the impacts, alternatives, and mitigation requirements for the proposed Laurentian Taconite Mine, a 1,200-acre project consisting of an open pit, stockpile area, service building, and haul road to the Minorca Plant.

**Certification of
Responsible
Government Unit**

I hereby certify that the information contained in this document is true and complete to the best of my knowledge and that copies of the completed Final EIS have been distributed to all parties on the official EQB distribution list.


for Karen L. Bowen, Deputy Commissioner 8/24/90
Assistant Commissioner for
Planning and Special Services Date

SEP 13 1990

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SECTION 1: Introduction

As required by the Minnesota Environmental Quality Board, the Minnesota Department of Natural Resources prepared this Final Environmental Impact Statement (EIS) for the proposed Laurentian Taconite Mine. The purpose of this Final EIS is to:

- Provide additional information supplementing or revising the Draft EIS
- Clarify issues discussed in the Draft EIS
- Respond to comments on the Draft EIS submitted during the Draft EIS public review period and the Draft EIS public meeting

This document, together with the Draft EIS, constitutes the Final EIS for the proposed Laurentian Taconite Mine.

Inland Steel Mining Company is proposing to develop a new open pit mine for the extraction of taconite ore. The 1,200-acre project would include: construction of and mining from an open pit; establishing an adjoining stockpile area for overburden, waste rock, and lean taconite; constructing a 6-mile haul road for trucking the mined ore to the processing plant; and constructing a service building that would include an equipment maintenance shop, shower and locker facilities for the employees, and an office. The project would occur near the cities of Gilbert and McKinley, Minnesota.

The Department of Natural Resources (DNR) prepared and distributed the Draft EIS for public review and comment. The public comment period began when the Draft EIS notice of availability was published in the EQB Monitor on June 25, 1990. The public meeting on the Draft EIS was held on July 16, 1990 in Gilbert, Minnesota, and the public comment period concluded on July 30, 1990. Throughout the public comment period and at the public meeting, the DNR received comments on several issues. This Final EIS was then prepared by the DNR to respond to these comments and concerns.

Section 2 of this Final EIS contains revisions to the Draft EIS, most in response to some of the public comments. Section 3 addresses each public comment on the Draft EIS in a comment and response format. Subsection 3.1 addresses written comments (copies of which are included), and Subsection 3.2 addresses comments given at the public meeting. Section 4 contains information on coordination of the Final EIS.

SECTION 2: Revisions and Supplementary Information to Draft EIS

2.1 Revised Economic Data for Minorca Taconite Mine and Plant

The section on socio-economics in Section 4 of the Draft EIS (page 4-106) gives inaccurate information on the number of employees at the Minorca Taconite Mine and Plant and on iron ore production data. The text under the heading, "Minorca Taconite Mine and Plant" should read:

The Inland Steel Minorca Taconite Mine and Plant currently employ 325 workers and paid more than \$12 million in wages and salaries in 1989, amounting to an average of \$36,600 per employee.

The Minorca facility produced 2.5 million tons of taconite pellets per year with a market value of \$71.8 million at current prices (\$28.72/ton, Skellings Mining Review, 1990). This represents approximately 4.25 percent of the estimated \$1.688 billion in output from Minnesota's iron ore industry for 1990.

2.2 Revised Population Information for the City of Gilbert

The section on socio-economics in Section 4 of the Draft EIS (page 4-107) gives the incorrect year for the City of Gilbert's population. The text should read:

The city had a 1980 population of 2,721.

2.3 *Revised Figure 5.2: Elevation-Duration Curve for White Lake*

The elevation-duration curve for White Lake shown on Figure 5.2 of the Draft EIS (Page 5-13) is in error. The curve representing the "highest lake levels" was incorrectly calculated because the starting water surface elevation input into the water balance (Elevation 1417.8) was low. This starting elevation is lower than any elevation modeled for the lake using climatic data for the years 1933 to 1986. The low starting elevation caused the lake elevation-duration curve to be lower than would be expected because of the artificially low lake levels at the beginning of the water balance period.

Therefore, the starting lake elevation in the model was raised to 1422.7 and the model was rerun. Elevation 1422.7 was selected because it is the average lake level calculated for the existing conditions analysis.

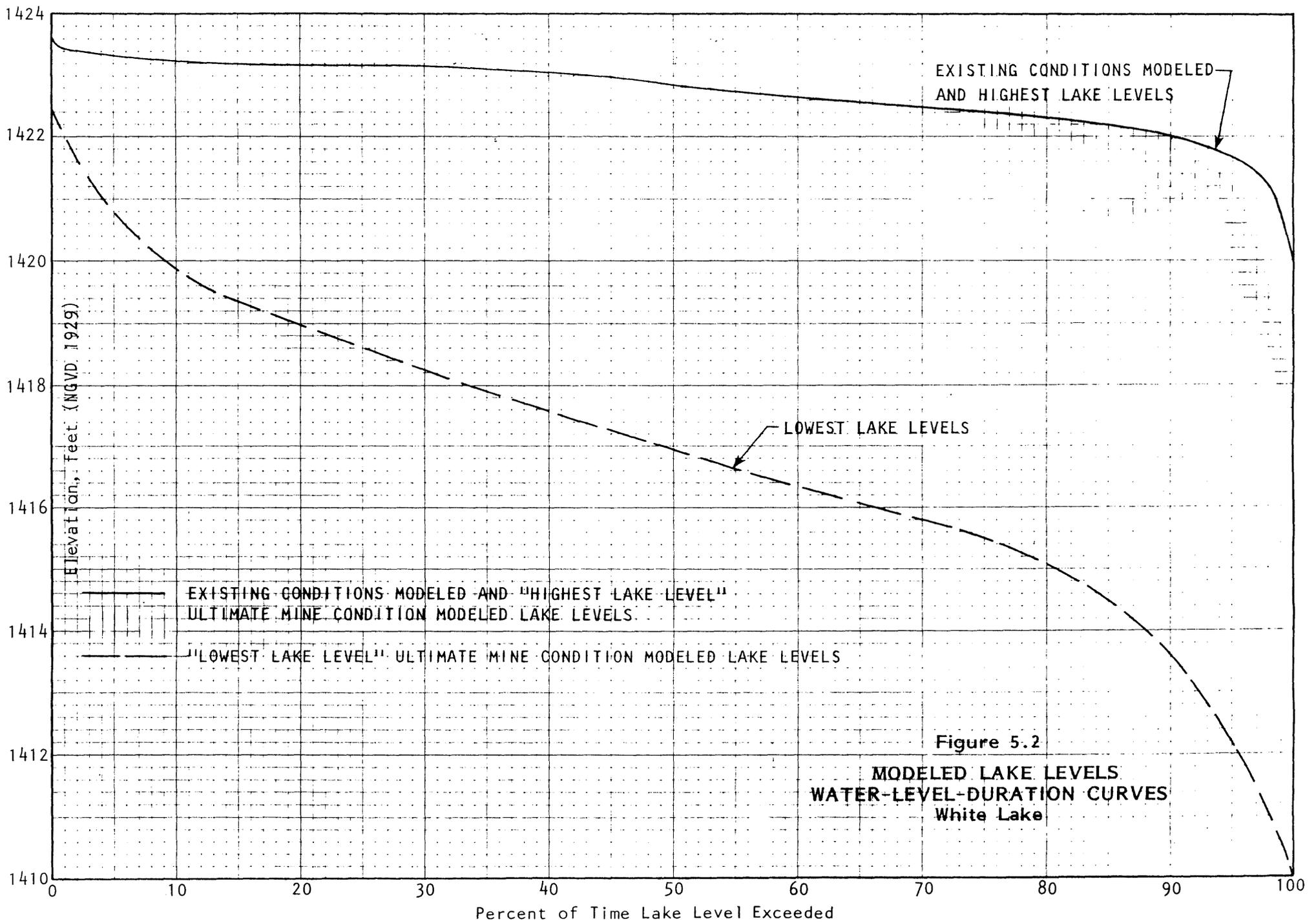
The new lake elevation-duration curve for the "highest lake level" analysis is only slightly lower than the curve for modeled existing conditions. Because these curves are very similar, they were plotted as one curve on the revised Figure 5.2.

2.4 *Revised Wetlands Mitigation Strategies*

Section 6 of the Draft EIS (Page 6-16, Figure 6.1 and Table 6.2) describes three alternative haul road routes designed to reduce the acreage of wetland impact. As mentioned on Page 6-16, several other factors would have to be considered before any of the routes could be permitted. These factors include:

- Noise, dust, and vibration impacts to Gilbert residents
- Impacts to fish and wildlife
- Impacts to forest vegetation
- Economic and engineering feasibility
- Surface ownership
- Compliance with existing mineland reclamation regulations

During the public review and comment period, the DNR received a number of comments regarding Haul Road Alignment Alternative #3. The DNR received petitions signed by more than 400 Gilbert residents indicating their opposition to that alignment, which would pass close to many residences. The residents cited the noise, dust, and vibration impacts that could be expected.



EXISTING CONDITIONS MODELED
AND HIGHEST LAKE LEVELS

LOWEST LAKE LEVELS

EXISTING CONDITIONS MODELED AND "HIGHEST LAKE LEVEL"
ULTIMATE MINE CONDITION MODELED LAKE LEVELS

"LOWEST LAKE LEVEL" ULTIMATE MINE CONDITION MODELED LAKE LEVELS

Figure 5.2
MODELED LAKE LEVELS
WATER-LEVEL-DURATION CURVES
White Lake

It was also determined that this alignment would not be in compliance with the State's mineland reclamation rules, which require that mining activities not occur within 500 feet of occupied dwellings unless allowed by the owner.

The DNR received information from Inland Steel detailing difficulties the company would have in securing easements from various public and private interests to build a road on this alignment.

The DNR also received comments from the U.S. Fish and Wildlife Service indicating the Service's preference for Alternative #3, citing reduced wetland impacts and reduced impacts to previously unmined areas as advantages.

Since publication of the Draft EIS, the DNR and Inland Steel have continued to evaluate various additional haul road alignments. These routes are shown in the revised Figure 6.1, included in this section, which replaces Figure 6.1 of the Draft EIS. Table 6.2 has also been revised to compare some of the cost and feasibility factors associated with the originally-proposed route and each of the alternatives. The wetlands-related text on Page 6-16 of the Draft EIS has been revised as follows:

Haul road construction could affect wetlands to varying degrees. The proposed haul road route would directly affect approximately 10 acres of wetland. Fewer wetlands could be affected if an alternative haul road route were used. Figure 6.1 shows seven alternative routes that would vary in their impacts to wetlands, and Table 6.2 lists the amount of wetland area that would be affected by each.

As shown by Routes 1 and 2, the area of affected wetland could be reduced by half if the haul road crossed the Pike River at a right angle. Route 3 would affect only 5 wetland acres, but would cause unacceptable noise, dust, and vibration impacts to local residents. Route 5 would impact no wetland (as it would cross the Pike River in a rocky downslope ravine), and would be substantially removed from the cities of Gilbert and McKinley.

Routes 3, 4, and 4A all would cross or run adjacent to previously-mined lands. This would limit the area of mining-related disturbance. It should be noted, however, that although some of the routes pass through land undisturbed by previous mining, the entire haul road area is undergoing extensive timber harvesting unrelated to the proposed project. Thus, all alignments would cross land that would have been previously disturbed in some way.

It is recommended that culverts be placed in any wetland or river crossings to allow the natural flow of water and avoid significant changes in water levels. The bottom of the culvert pipes should be at least 18 inches below the wetland

surface. Water collection and discharge ditches upstream and downstream of the road should be constructed as well. Culverts should be placed at approximately 300-foot intervals at each wetland crossing (Verry, 1988). A permeable fill material, such as crushed rock or gravel, should be used for road construction in wetlands for at least the bottom layer (Lightfoot, 1990).

If mine dewatering were to lower wetland water levels, dewatering discharge water could be routed to the wetlands to replenish water.

As many as 45 acres of wetland could be lost as a result of stockpiling and mining; additional wetland could be lost due to haul road construction. It is recommended that any wetland losses be compensated by replacing them with wetlands of similar habitat value, or by improving other wetlands. The creation or restoration of wetlands should occur as close to the project area as possible.

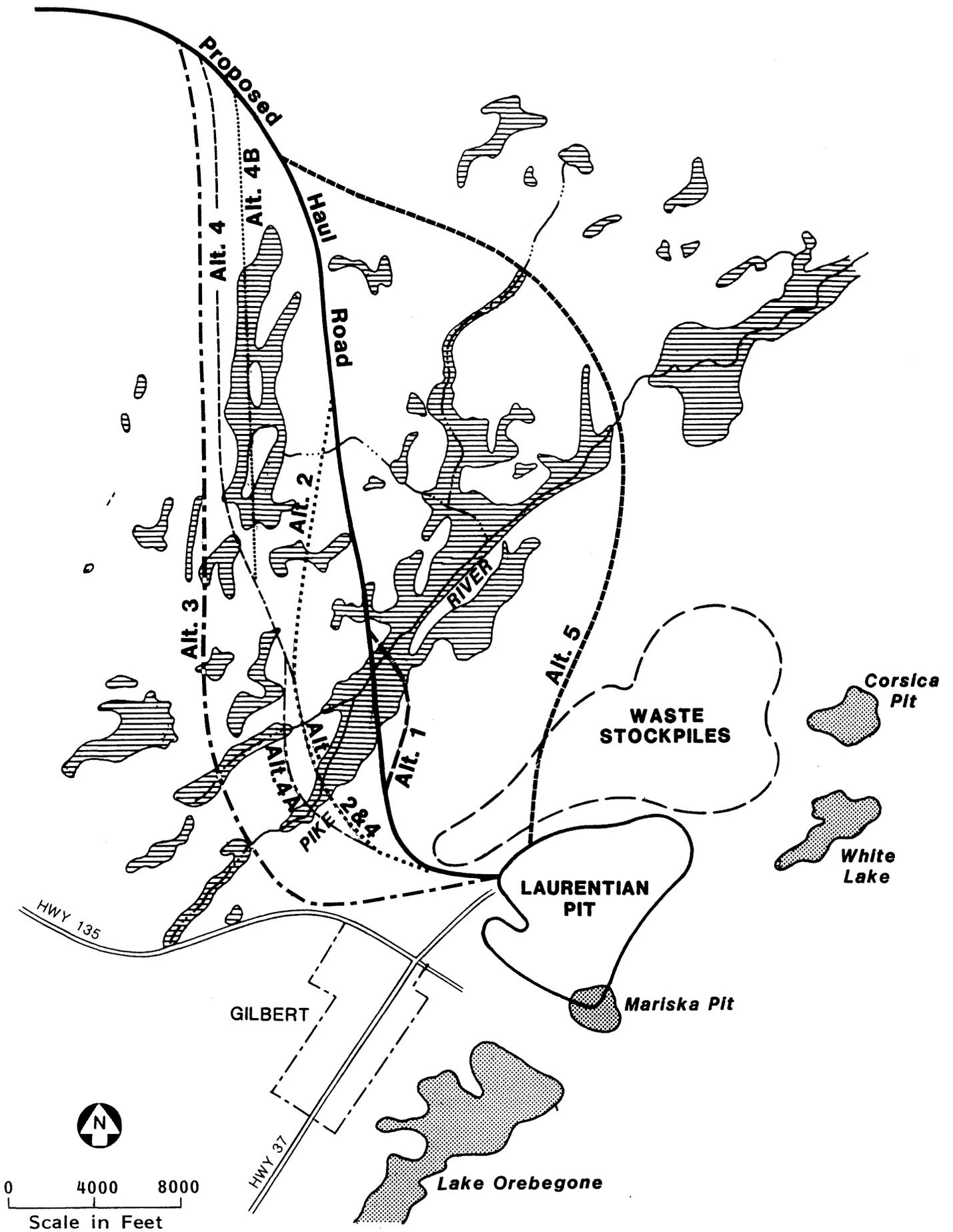


Figure 6.1
 ALTERNATIVE
 HAUL ROAD ROUTES

TABLE 6.2
WETLAND IMPACTS AND OTHER FACTORS RELATED TO
ALTERNATIVE HAUL ROAD ROUTES

	Proposed Route	Alt. #1	Alt. #2	Alt. #3	Alt. #4	Alt. #4A	Alt. #4B*	Alt. #5
Wetland Impact (in acres)**	10.0	6.0	4.5	5.0	5.5	3.0	21.0	0
Land Ownership Difficulties	No	No	No	Yes	Yes	Yes	Yes	Yes
Distance Increase (in feet)	0	700	700	2750	1900	2400	--	2000
Additional Construction Cost (in \$000)	0	75	1095	2430	275	582	--	36
Additional Yearly Operating Cost (in \$000)	0	31	31	114	77	100	--	132

* Not analyzed in detail due to acreage of wetlands impacted

** Based on wetlands delineated on National Wetland Inventory Maps (see Figure 4.20)

SECTION 3: Public Comments on Draft EIS and DNR Responses

The Draft EIS public review and comment period began June 25, 1990 and concluded July 30, 1990. The public meeting on the Draft EIS was held on July 16, 1990 in Gilbert, Minnesota. The typewritten transcript of the meeting is available for review at:

Minnesota Department of Natural Resources
Office of Planning - 6th Floor
500 Lafayette Road
St. Paul, MN 55155-4010

Comments on the Draft EIS were received at the public meeting and during the official public comment period. All timely and substantive comments on the Draft EIS along with the Department's responses are included in this section. The comments and responses are organized as follows:

- | | |
|-------------|---|
| Section 3.1 | Written comments on the Draft EIS, including those submitted at the public meeting, and the DNR responses |
| Section 3.2 | Statements and questions on the Draft EIS made orally at the public meeting, and the DNR responses |

3.1 Written Public Comments and DNR Responses

The following pages contain reduced copies of written public comments and the Department of Natural Resources' responses.

MINNESOTA DEPARTMENT OF NATURAL RESOURCES

LAURENTIAN TACONITE MINE - DRAFT EIS

JULY 16, 1990 - GILBERT, MINNESOTA

DRAFT EIS COMMENT FORM

The Department will prepare a Final EIS for the Laurentian Taconite Mine, based on the comments received on the Draft EIS. We will appreciate receiving your comments on the Draft EIS. You may find it convenient to use this form to submit your written comments.

It's one of the closest home owners of the proposed mine and as Mayor of this city of Gilbert, I have concerns for the protection of the safety & well being of all the citizens of Gilbert, as well as the community in general.

1A

It is my hope that the DNR, Inland Steel, and all pollution control agencies do everything they possibly can to make sure the City of Gilbert will not be a target of any unsafe or disruptive living conditions due to this new project in the city limits.

1B

I am in full support of this project, only so long as the greater majority of the concerns of the citizens of my community, who I represent are met.

Mayor Karl Oberstar, Jr.

Please leave this form with any of the DNR staff at the meeting, or mail it to:

Rebecca A. Wooden, Environmental Planner
NR Planning and Review Services
Minnesota DNR
500 Lafayette Road
St. Paul, MN 55155-4010

Comments on the Draft EIS must be received by Monday, July 30, 1990 at 4:30 P.M.

RESPONSES

3.1.1 The Honorable Karl Oberstar, Jr., Mayor of the City of Gilbert

1A The DNR notes these comments, and shares Mayor Oberstar's concern that the proposed project not cause unsafe or disruptive living conditions in the City of Gilbert.

Section 2 of the Draft EIS lists the various permits that will be required for the proposed project. Mayor Oberstar's concerns will be conveyed, with publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project.

In the Final EIS, the Department will respond to timely substantive comments on the draft EIS consistent with the scoping decision. Any person submitting substantive comments on the Draft EIS will receive a copy of the Final EIS, as well as the EIS Adequacy Decision. To receive a copy of these documents, please supply your name and mailing address:

Name: Mayor Karl Oberste Jr. Mayor Karl Oberste Jr.
Address: 512 De Korte Avenue Box 601
City, State, Zip: Gilbert, Minnesota 55741

RESPONSES, CONT.

- 1B** The DNR acknowledges this comment and concern. With the publication of the Final EIS, comments related to the merits of the proposed project and to permitting requirements will be provided to the project proposer and to various decision makers for their consideration in regulatory decisions under their control.

July 11, 1990

Officials of the EIS Hearing
Gilbert City Hall
Gilbert, MN 55741



Dear Officials:

After reviewing the Laurentian Mine Environmental Statement, we undersigned, have serious concerns regarding the proposed Alternative #3 haul road for the following reasons:

2A

1) Proximity to existing residential neighborhoods

The answer to question #23 of the Environmental Assessment Worksheet and pages S-5, S-76 and S-13 all refer to any mining activity being no closer than 1000 feet from the nearest residence. In reality, the proposed Alternative #3 haul road comes well within 1000 feet of the residential section of Gilbert and as close as 250 feet from a number of households.

2) Noise

As stated on page S-5, one of the greatest noise impacts of the proposed project would result from haul road truck traffic.

Once the project is in full operation, it is expected that 60 round trips per shift will be made by 120- and/or 195-ton production trucks. To put this in perspective, one of these trucks will be going past our residential neighborhood every four minutes, twenty four hours a day, seven days a week. And with the sound of the trucks approaching and leaving the area, the noise will be continuous.

2B

Unlike the area east of us, in which a sound attenuation berm will be constructed to reduce noise levels, the construction of a berm would not be possible in our area because of the railroad grade running adjacent to Highway 135.

RESPONSES

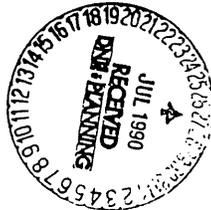
3.1.2 Mr. Mark St. Lawrence (Representing 31 Petitioners)

2A

In Section 6 of the Draft EIS, various haul road alignments are offered as possible measures to minimize impacts to wetlands in the project area. The Draft EIS indicates that overall impacts and engineering feasibility would have to be considered (in addition to wetland impacts) before a route other than that analyzed as part of the proposed project could be constructed.

Another factor to be considered in haul road alignment selection is compliance with Minnesota Rules Chapter 6130, the mineland reclamation rules. These rules, in part, address the siting of mining facilities. In general, the rules require that mining activities not occur within the following setbacks:

- 12). Tom & Joan Redman
- 13). Gene Permatte
- 14). Joe & Sylvia Dolne
- 15). John & Linda Richards
- 16). Ed & Marge Whick
- 17). Donald A. Kovach
- 18). Edward Kodance
- 19). Lois & Eugene Jaso
- 20). Judy Oniroa
- 21). Joe & Patty Skofich & family
- 22). Roland & Mary Ager
- 23). John & Anne Mattson
- 24). Jerry & Eileen Hocking & Family
- 25). John & Mary Jo Finizil & family
- 26). Shari Eckel
- 27). Tony & Julie Trunzo
- 28). Tom & Linda DeLuca
- 29). Ralph & Cleo Carr
- 30). Mays & Carl Oberst Jr.
- 31). Mike Olson % Olt Olson # Court St.



RESPONSES, CONT.

The Draft EIS does not include an analysis of impacts that would occur should any mining activity be sited within 1,000 feet of a residence. For these reasons, it is the Department's view that should Inland Steel Mining Company designate Haul Road Alignment Alternative #3 as its preferred and proposed route, an EIS addendum or supplement would be necessary to evaluate noise, dust, and vibration impacts to nearby residences.

Refer also to Final EIS Section 2.4. This section contains revised Draft EIS Section 6, pages 6-15 to 6-18, which was revised to include additional information pertaining to alternative haul road routes.

Refer also to Final EIS Section 3.1.10D, which responds to a comment letter from the U.S. Fish and Wildlife Service indicating that agency's view of Haul Road Alignment Alternative #3.

- 2B** The Department concurs with this estimate of potential noise impacts and agrees that it would not be feasible to construct a sound attenuation berm between Haul Road Alignment Alternative #3 and nearby residences at the point where the alignment would most closely approach the residences. See also the response to Comment 2A in this section, which further explains the Department's view regarding this alignment.
- 2C** This comment is acknowledged by the DNR. See also the response to Comment 2A in this section, which discusses this alignment in greater detail.
- 2D** The Department concurs that factors in addition to preservation of wetland areas should be considered when selecting a haul road alignment. The necessity of evaluating other factors is presented in the Draft EIS. See also the response to Comment 2A in this section, which discusses this alignment in greater detail.
- 2E** This comment is acknowledged by the DNR. As part of Final EIS preparation, the Responsible Governmental Unit (RGU) -- in this case, the DNR -- does not select a preferred alternative, nor does it make permitting decisions. Comments related to permitting will be, with publication of the Final EIS, provided to various decision makers for their consideration in regulatory decisions under their control.

July 19, 1990

Environmental Impact Statement Officials
 c/o Ms. Rebecca Wooden
 MN Dept. of Natural Resources
 500 Lafayette Road
 St. Paul, MN 55155-4010



Dear EIS Officials:

- 3A** | We, the undersigned, fully support and endorse the petition submitted at the Environmental Impact Statement public hearing held on Monday, July 16, 1990, in the Gilbert City Hall.
- 3B** | The air quality issue regarding dust from the haul road is not only a neighborhood concern but a problem that affects our entire city.
- 3C** | Because of its location, and the dust and noise problems that would result, the Alternative #3 haul road or any variation is totally unacceptable to the citizens of Gilbert.

Enclosed, please find a copy of the submitted petition that we totally support.

Respectfully yours,

Encl.

RESPONSES

3.1.3 Mr. Mark St. Lawrence (Representing Approximately 400 Petitioners)

- 3A** The Department recognizes this petition as an expression of support for the petition contained in Final EIS Section 3.1.2.
- 3B** See the response to Comment 2C in Final EIS Section 3.1.2, which responds to a similar comment also submitted by Mr. St. Lawrence.
- 3C** See the response to Comment 2E in Final EIS Section 3.1.2, which responds to a similar comment also submitted by Mr. St. Lawrence.

Re: Laurentian Mine E.I.S. 7/26/90

Rebecca,

Please submit this petition under
the Public Comment portion of the E.I.S.
review.

Thank you.

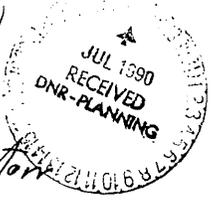
Mark St-Laurence
Gilbert, Minn.



Mary D. Shesterick 221 N. Broadway Gilbert Min
 Nancy J. Kautigan
 James T. Kautigan & family } 112 Michigan Ave Gilbert
 Mary A. Snyder 413 Dakota Ave W - Gilbert
 Ted Shesterick 115 W. MITT AVE Gilbert
 Jane Krakok 202 E. Minn. Ave Gilbert
 Dorothy Decker 219 Wells Ave Gilbert
 Bill Krebs NEVADA & Broadway Gilbert
 J. P. Pashern 213 W. A Gilbert
 Lois Skule - 209 N. Broadway Gilbert
 Paul E. Biondich 104 DAKOTA AVENUE GILBERT
 Lois K. Ziemer 110 N. Broadway - Gilbert
 W. F. Vesely 213 E. Michigan Ave. - Gilbert
 John & Betty Dryden 111 Michigan Ave Gilbert
 Chire Wrensch Summit St. Gilbert
 Shelly Wrensch Summit St. Gilbert
 David J. Fohg 312 NE AVE Gilbert
 John Stumack 702 S. Broadway
 Melba 118 E Ind Ave Gilbert
 Mary Ann Deuster 120 Dakota Gilbert
 Angela Milanovich - 115 Indiana Ave. N. Gilbert
 Bruce Fry 223 1/2 N. Broadway Gilbert
 Mary A. White 311 W Broadway Gilbert
 Patricia Shustick 115 W. Michigan Ave. Gilbert



<u>Name</u>	<u>Address</u>
Mary Salo	218 Wisconsin Ave. Gilbert
Anna Salo	" " Gilbert
Louis Proser	212 Wis Ave " "
Anna Ruth Lutter	215 Ma. Ave. St. Gilbert
Beatrice M. Kapler	304 Wis Ave.
Julie Blesko	315 N. Broadway
Bill Skule	320 Summit
Rose Connor	219 Nebraska Ave Gilbert
James H. Connor	219 Nebraska Ave Gilbert
Mrs. Bella Ruzick	219 Wis ave. W.
John K. Kamenich & Leone	118 E. Niagara Gilbert
Tom & Louisa Kamenich	202 So Summit
Frances Kavitovich	
Joseph Zogman	4916 Heritage Trail Gilbert
Janet Zogman	4916 Heritage Trail "
Deen M. Jachet	520 Indiana Ave. "
Marian Oberstork	Gilbert 216 Virginia Ave. Gilbert
Mary Hunter	36 Nevada Ave. Gilbert
Augusta Hunter	" " "
Charles Skrinaw	122 N. Y. Ave E.
Paul Oberstork Sr.	Gilbert 216 Virginia AVE. "
Maria Biondich	102 Dakota Ave. Gilbert, Mo.
John Biondich	11917 " R N 4 " T
Paul Zogman	

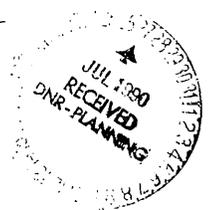


Name

Eric & Fanti
 Enrico Schweiger
 Anne Hooper
 Ann Dowdery
 Marco Dendel
 E. Don Addy
 Anna Kelle
 Rose Klink
 Joe Dwyer
 Rose Bruck
 Barbara Jamnik
 Donna Murphy
 Mary Lillis
 Terry Shanks
 Fred Brachak
 Frank Anell
 Linda Sausman
 Andis Harju
 Harold Rudelson
 Jack Merolt
 Paul E. J. J. J.
 Mardyn Bruner
 Kelly J. J. J.

Address

207 Dakota Ave.
 Duluth, Minn.
 114 W. Ave. W
 Gilbert
 119 E. Main Ave
 Gilbert
 101 Nevada Ave
 Gilbert
 411 - Indiana Ave
 224 E. Main Gilbert
 117 Washington Ave.
 102 Va. Ave
 204 So. Ave. D.C.
 104 Indiana Ave.
 212 Iowa Ave
 119 Indiana Ave E.
 100 E. Durbin Ave.
 111 Ohio Ave.
 201 Ohio Ave
 509 ~~Indiana~~ Ave
 114 Wisconsin Ave E.
 6621 Elm Drive, Gilbert, Mn.
 110 S Broadway Gilbert
 108 Florida Ave Gilbert
 116 Louisiana Ave Gilbert
 118 Wise. Ave. E.
 210 Indiana Ave.



<u>Name</u>	<u>Address</u>
John Shiber	108 Nebraska Ave
Rose Sambich	207 Nevada Ave
Joe Sambich	207 Nevada Ave
Mary Sambich	207 Nevada Ave
Al Olsen	Circles Dr
Mary Kusch	219 W. Me.
Rosie Sandstrom	202 Nebraska Ave. W.
Mary Securi	213 Nevada Ave. W.
Edna Hocking	317 Nevada Ave.
Louis Majors	101 Nebraska Ave
William O. Foster	502 nd Minnesota
Dorothy Gentile	103 N. Wisconsin
Ella Moore	101 N. Broadway
John Pike	710 S. Broadway
Mary Pike	710 S. Broadway
Tony Ferni	220 Dakota Ave. Gilbert, MN.
Shirley Hale	514 S. Broadway
Lu Oerke	Box 788 Gilbert
William Krup	102 NY Ave E. Gilbert
Paul Bordick	104 EAST Wisc Ave
Emu Niemi	214 East Main Ave



<u>Name</u>	<u>address</u>
Dem. Csepel	609 S. Broadway Gilbert, Minn.
Kathy White	119 W. Mich. Ave Gilbert
Pete Begich	218 Arizona Ave.
Arno Conla	106 N. V. Ave.
Erick Lechonen	112 N. York Ave.
Violet Book	108 St. York Ave.
Maynard Berba	115 Wisconsin Ave. W.
Phyllis Kupar	309 So. Broadway
Tom Kupar	"
Joe Kabe	113 Minnesota Ave
Margaret Linn	302 W. Michigan
Virginia Conklin	116 Wis. Ave W.
Jammie Bloomquist	106 Pleasant View Court
Mr. & Mrs. Joe & Victoria Stebe	414 So. Broadway
Peggy Berba	115 Wis. Ave. W.
Helen Drescher	16 N. Summit St.
Frank Gustafson	123 Nebraska
Maria Erhul	107 Louisiana Ave.
Bruno Kuter 712 Indiana Ave.	712 Louisiana Ave.
" " "	316 N. York &
" " "	Gilbert
Coyle Kuter	
Elsie Mestrick 205 W. Minn. Ave. Gilbert	
Uros Malkovich 217 N Broadway Gilbert	
Franka Lesch 105 Nebraska ave. Gilbert	
Queen Daniels 220 Nebraska Ave. "	



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Luc Samaryk	103 134 Ave W
John Kiska	215 134 Ave W
Joe Kiskis	420 Indiana Ave
Gene Maren	114 Michigan Ave
Dr. Mary David	108 DAKOTA AVE.
Mary Blandish	103 Babata Ave
Kawronick	105 Michigan Ave
Emily J. Saar	104 134 Ave W
Mike J. Poposka	211 W. LOUISIANA A.
Pauline Peterson	420 Mich Ave. W.
Joe Hatch	120 Indiana Ave W.
Erdon Bratherton	420 Brad
Kaye Ollers	Box 866 - 304 Dergins Ave W.
Sophie Bombich	319 Ind. Ave
Emil Charmoli	115 W NEW JERSEY
Mary Charmoli	113 W. New Jersey
Dana Hill	306 N. Broadway
Becky	
Frank Brula	
Miss Brula 306 NO. Broadway	205 N Broadway Gilbert
James Adamie	110 St W - Gilbert
Lewis Jagunich	110 St W - Gilbert
Mrs Anna Jagunich	108 Minnesota Ave.
Luis Lampu	314 7th Ave
George Anderson	



Mrs. Mable Meble	Mich Ave.	Gilbert
Mary Meble	" "	"
David Mehl	701 WEST MICH	GILBERT
Sally K. Heron	" "	"
Mike & Leson	705 Mich.	Gilbert -
Mr. & Mrs. Richard Mueller	707 W Michigan	Gilbert
Mr. & Mrs. Kim Nien	709 Michigan	Gilbert
Mr. & Mrs. Mike Pahl	2 Forest Ridge	Gilbert
Mr & Mrs Joe Sente	#4 Forest Ridge	Gilbert
Mr. & Mrs. Don Brakesley	5 Forest Ridge	Gilbert
Mr. & Mrs. Joe Hutzman	610 W Mich	Gilbert
Jill Seibel + Al Seibel	520 W. Mich	Gilbert
Justine Kosher	519 Michigan St.	Gilbert
Jan Kosher	519 Michigan St.	Gilbert
William Beaton	518 Michigan W	Gilbert
Carol Beaton	518 Michigan W.	Gilbert
Tom Youth	516 Mich. W	Gilbert
Evelyn Youth	510 Mich. Ave. W.	Gilbert
Leo Juakel	307 W Pleasant St	Gilbert
Frank Beaton	420 MICH. AVE. W.	GILBERT
Edward K. Beaton	420 Michigan Ave W	Gilbert
William Bonick	402 Michigan Ave W	Gilbert
William Naval	320 MICHIGAN AVE.	Gilbert
Mary Ann Neuge	320 Michigan Ave.	Gilbert
Calvin I. Stiefen	316 Michigan Ave. W.	Gilbert
Carol Nolan	305 Indiana Ave W.	Gilbert
Katherine Thompson	312 Michigan Ave W.	Gilbert



Mr. + Mrs. Wally Ferkel Box 125 Gilbert 501 Michigan Ave.
Donatello Ferkel, Laverne Ferkel Michigan Ave.
Henrietta Spellan 308 MN Ave W GILBERT

Frank J. Spellan " "

Mr + Mrs Joseph Muchvic 320 MN Ave - Gilbert

Josephine Penkushy 402 MN Ave. W. Gilbert

Bene Kedowski & Phyllis Kedowski 417 MN Ave W. Gilbert

Mr. Mrs. Delak 420 MN Ave, G. I.

Robert Samargia 601 Indiana Ave. Gilbert

Luzette Samargia 601 W. Indiana Ave., Gilbert

Maryann Crep 503 MN Ave W. G.

Jack Latimer 506 MN Ave W Gilbert

Shirley Latimer 506 MN Ave W. Gilbert

Lillian Bankosky 511 Minnesota W. Gilbert

Veter Ben Kosky " "

William Antona 515 Minnesota Ave W. Gilbert

Jean Antona " "

~~Frank~~ 601 Minnesota Ave W. Gilbert

Mrs. Walter Delo 620 Michigan Ave. W Gilbert

Rita Samuel 404 WIS. AVE GILBERT

Verne Samuel 404 WIS AVE GILBERT

Sylvia Martre 202 Va. Ave GILBERT

Mrs Mrs Stanley Beton 408 Wick Ave Gilbert

Mrs Mrs Leroy Phillips 115 Lehigh Ave. Gilbert

Joseph F. Susnik Gilbert MINN



Clara L. McKeonick 108 Louisiana Ave W. Gilbert
 Mrs. R. V. Churchies 107 E. Louisiana
 Clifford Chronick Box 814-301 Summit St Gilbert
 Mr. & Mrs. Joe Brondeck 512 W MN Ave Gilbert
 Paul J. J. 301 Main Ave Gilbert
 Raymond J. Johnson 201 New York Ave GILBERT
 Paul Moratt 130 Nebraska Ave Gilbert
 Thomas J. Skenzick 119 W. Wisconsin Ave Gilbert
 Terry J. M. 616 East
 Mr. & Mrs. Stanly Indihar 3 WISCONSIN AVE. E
 Gilbert
 Mrs & Mrs John Eckert 402 BROADWAY
 Mrs & Mrs Donald Glotch 315 Dakota Ave.
 Mr & Mrs Dennis Swoslow 202 NEBRASKA AVE. W
 Mary Champa 104 - Virginia Ave
~~Mr~~ Kerley & Rose Mandler 206 Iowa Ave, Gilbert
 Raymond Kaimul 111 New Jersey Ave
 Frank Lopp 102 Louisiana Ave
 Joann Lopp 102 Louisiana Ave
 Lela Klaras 208 Virginia Av.
 George H. Skenzick 117 Wisconsin Ave.
 Andy Bindich 103 Dakota Ave
 New SANDON 107 MN AV
 Pat Hogan 102 main W



Steve M. Foye	Box 626	GILBERT
Dennis J. Dinski	Box 72	Gilbert
Leo Spauko	Box 942	"
Long Lillan	Box 1103	Gilbert
Millie M. Mohr		
Larry M. Mohr	Box 262	GILBERT
Robert Newman	Box 477	Gilbert
Frank & Virginia M. Weins	Box 128	Gilbert
Paul M. Kaska	Box 973	GILBERT
Dorlene Nikunen	7519 Spunk Cin Dr.	EVY. ILLINOIS
Bete Maloney	115 E. INDIANA	Gilbert
Edward P. Kozay	405 Michie	Gilbert
Judy Cadeau	P.O. Box 625	Gilbert
James A. Korpi	6526 Cypress Lane	Gilbert
Richard E. Stutz	320 INDIANA 1/2 W.	GILBERT
James Lindberg	Bismarck	
Richard W. Simon		Gilbert
Harold Melos	Box 233	Gilbert
Daren Kelly	Box 575	"



Eugen F. Fedrowski 417 7th. ave. W. Gilbert

Mrs & Mrs Ruckard & Vice E. retul 101 Garrison Ave. W. Bitter

Frances Lopp 106 New York Avenue - W

Joseph Madach 201 Virginia Ave W

Leopolda Schutte 501 Mich. W. Gilbert.

Bill Tushar Ct. Dakota & Broadway

Julie Tushar " " " "

Prohrej Dnick Gilbert

Frank Krause 14 N. Broadway Gilbert

Richard Krause " " "

Sharon Asselin Florida Ave Gilbert

Ken Asselin Florida Ave

Harvy Jordahl Virginia Ave.

Cheryl Pash Florida Ave Gilbert

Jack Yulkin New York Ave - Gilbert

Mary Bradaet South Broadway GILBERT

John & Avis Zyzanski " " "

Jenny Soodnik

John C. P Summit View Est >

Artes Asund Cleveland St. Eudith



Rak Jannick K. Jannick	212 Janna Ave Gilbert, Ariz. 201 White Ave Gilbert
Louis Schmitt CR456 Carpenter	108 E Mich Ave E Gilbert 215 Cambridge HOLT LAKE, MN.
Ann Smith 502 E. ...	520 Minnesota Ave W.
Annus Mattson	520 Minnesota Ave W.
Margaret M. Mattson	521 Minnesota Ave W.
Richard W. Panyan	506 Michigan Ave W.
Suphane Jabel	4 Mc Kenley Minn
Fran Boyzke	202 Dakota Gibson, MI 48741
Normin Rusk	106 New York Ave Gilbert
Lois Hagen	118 Florida Ave Gilbert
John Varva	519 South Broadway
Rudwig Spavee	406 Mich to Gilbert
Chas. Anderson	SPARTA
David Totter	218 Indiana Ave
Anne Curko	412 Indiana Ave
Philip Guban	170 Dakota
Paul Schuster	
Anti H. Abbiner	Sparta



M. Schulze 520 Summit Gilbert
 Karen Mills Hoyt Lakes
 Jean Morgan 107 Iowa Ave Gilbert
 Dan Ebbesen 112 Florida Ave W Gilbert
 Mona Link 305 Nevada Gilbert
 Ann Anderson 119 Indiana Gilbert
 Marietta Sandstrom 502 So Broadway Gilbert
 Lou Rozich 11 W. Nebraska Ave. Gilbert
 Mrs Johnd D. Melim 116 IOWA AVE Gilbert
 Lois Jensen Summit View Estates Gilbert
 Vera Gabriel 119 New York Ave. Gilbert
 Anthony Leber 114 Louisiana St. Gilbert
 Rose Kanelick 107 New Jersey Ave. "
 Elsie Givaty Hoyt Lakes
 Dorothy Mann 207 W Mich Ave. Gilbert
 Mandy Johnson 420 S. Broadway Gilbert
 Annie Reiner 103 1/2 New York Ave - Gil.
 Edward Semaja 105 Nebraska Ave. W. Gilbert
 Kim Zelasco 305 N. Broadway Gilbert
 Jeanne Hall Gilbert
 Louis J. Ventile GILBERT
 Norma Fort 1.11.1



Albin Luoma	217 Louisiana Ave	Gilbert
H. Marala		Gilbert
O. Manton	Box 551	Gilbert
James Olson	Box 1021	GILBERT
Jim Wami	Box 1022	Gilbert
Richard E. Koller	212 New York Ave W	GILBERT
Lawrence Mault	220 Ave	Gilbert
John Testar	114 MN Ave	"
Lawn Sader	7066 Peda	Gilbert
Bill Owens	Summit View Estates	Gilbert
Harvey Hall	212 Nebraska	Gilbert
Don Drake	Box 543	Gilbert
Bill Adlman	Box 915	Gilbert
Lee Portner	121 N.H. Ave East	GILBERT
Herb Flesing	215 N. Broadway	Gilbert
Rosanne Olson	320 Indiana Ave. W.	Gilbert
Mike Lyle	Box 242	Gilbert
Leo Shue	Box 83	Gilbert
Margaret Grahik	Box 42, 209 E. MN Ave	Gilbert
Lauree Trunyo	Box 927	Gilbert
Willard Martinson	Box 772	Gilbert



William P. Wood 124 New York Ave E. Gilbert, MN
 Gene A Hopp 118 S Broadway, Gilbert, MN
 Robert E Gutzke 319 DAKOTA Ave GILBERT.
 PAT. Gutzke 319 DAKOTA Ave GILBERT.
 Mike Poole 312 So Broadway GILBERT
 George Sarnoga 114 Anderson Ave Gilbert
 Oliver Sarnoga 114 Indiana Ave Gilbert.
 Janet Dierck 114 Indiana Ave Gilbert, Mn
 Conrad St Lawrence Gilbert
 Betty St Lawrence Gilbert



Name	Street Address	City
1. Leo F. Shubert	220 Minn. Ave.	Gilbert, MN 55741
2. Florence Shubert	220 Minn Ave	Gilbert 55741
3. Ann Carroll	301 Minn. Ave.	" "
4. Mary K. Novak	210 W. Minn. Ave	Gilbert 55741
5. Phyllis Dery	203 Minn Ave W	Gilbert, MN 55741
6. Kathleen Papin	204 Minn Ave W.	Gilbert 55741
7. Mary Kay Nantz	118 Minn Ave W	Gilbert, 55741
8. Edith Nantz	115 MN AVE W	Gilbert, 55741
9. Anne Tustan	114 MN Ave W.	Gilbert, 55741
10. John Tustan	114 mn AVE W.	Gilbert 55741
11. Sharon Landon	107 mn. av. W.	Gilbert, mn. 55741
12. Myra July	119 W min ave	Gilbert
13. Colleen A. Haley	119 W MN AVE	Gilbert, MN 55741
14. Klara A. Haley	119 W. Minn. Ave minn apt 115	Gilbert, Mn. 55741 Gilbert
15. Stone Thomas		Gilbert
16. Joe Kobe	113 Minn. Ave	Gilbert Mn 55741
17. Joseph H. Hooking	211 Minn. Ave. W.	Gilbert, Mn 55741
19. Maydelle Hooking	211 Minn. Ave. W.	Gilbert, MN 55741
20. Dorothy Lindstrom	301 Dakota Ave. W.	Gilbert, Mn 55741
21. Frances J. Keon	604 DuSable Ave	Gilbert, MN 55741
22. Lucy Jenni	604 Indiana Ave.	Gilbert
23. Fran Leoni	219 Minn Ave	"
24.		



20

NAME

ADDRESS

Robert Korte
Wanda Sumner
Gaudin, Ellwood
James Juntjar

118 Nixon Ave Gilbert, MN
113 Ohio Ave - Gilbert
124 N. Y. Ave E Gilbert
112 Mich Ave E Gilbert

Alicia Peskin
Scott Peskin
Bon Hill
Ed Koko
Patti Hill

316 Wisconsin Gilbert
4776 Central Gilbert
Gilbert, MN

Daniel Takanen
Mandy Hill
Amy Hill
Sara Collins

Gilbert MN.
" "
" "
" "
" "

Donip Dowle
Robert Thomas
Michael Coff
Dail J. me

Sparta
Gilbert, MN
McKinley
Gilbert

John Kuten
Wm D. Haub

Gilbert
Gilbert



NAME

Wm. Lusk
Carl Gibson
J. R. Engled
Jim Biondich
Bob Blatch
Bob Pizzello
Stephanie Williams

ADDRESS

Madison
Lynn
Evelith 417 MARQUE ST
GILBERT - 4810 CHESTNUT DR

Evelith
Gilbert



Name

Address

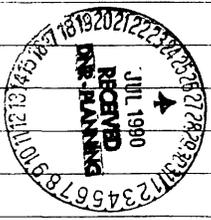
Nela S. S. S.
Debra S. S.
C. S. S.
~~S. S. S.~~
S. S. S.

120 W. Florida Ave.
205 New Jer. Ave.

110 N. Broadway St.
206 S. Ave. W.



NAME	ADDRESS
Long Cornish	115 Ohio
N. Dale Tavel	Santa
Frank Debelto	Gilbert
Molly Debelto	"
Ben Jackson	GILBERT
John Steeniska	"
Paul Schubert	"
Patrick Hagan	"
Grant	"
Chester Progonicki	"
Jackie Blum	"
Walter B. Olson	"
Judy Omerca	



Name

Address

Dave Dickson
Tim Dickson

319 N. Broadway
"





Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155
Telephone (612) 296-6300



July 20, 1990

Ms. Rebecca Wooden
Department of Natural Resources
Office of Planning
500 Lafayette Road
St. Paul, Minnesota 55155

Dear Ms. Wooden:

RE: Proposed Laurentian Taconite Mine Environmental Impact Statement

The above document has been reviewed by Minnesota Pollution Control Agency (MPCA) staff. We have the following comments:

- 4A | P.3-5 p.1: During the scoping process, we noted the fact that the abandoned Elcor townsite would be obliterated by the proposed mining operation. There may thus be an abandoned open dump as well as buried filling station or domestic fuel oil tanks in the area. If so, MPCA staff must be consulted about the proper means of closure and disposal.
- 4B | P.3-8 p.1: As we have also noted before, construction of a truck repair shop implies the installation of one or more tanks. MPCA permits may be needed for such tanks. This issue should be discussed in the Environmental Impact Statement (EIS).
- 4C | P.3-14 p.3: Hindsight indicates that a more thorough evaluation of ore transportation alternatives would have been a good idea.
- 4D | P.4-18 p.1: The modeling result probably shows a NET outflow to ground water. Inflow most likely is still occurring and will continue to occur.
- 4E | P.4-82 p.2: Although borrow pits and abandoned mine pits do not fit neatly into the Cowardin wetland classification system, ignoring their existence is not appropriate. Unless they are part of an active industrial operation, they are considered waters of the state, and are protected under MPCA water quality rules.
- 4F | P.4-107 p.2: The 1989 population estimate of 2721 and the 1988 bar on the graph on the next page do not match.
- 4G | P.5-36 p.3: What is the estimated time required for mine and ground water levels to stabilize after mining ceases?
- 4H | P.5-37 fig. 5-8: The flexures in the 1410 and 1420 contour lines around Mariska Lake and Lake Orebegone indicate that the ground water levels in the vicinity may not yet have stabilized, although mining ceased long ago.

RESPONSES

3.1.4 Minnesota Pollution Control Agency (MPCA)

4A The project proposer's representative has indicated that prior to stockpiling on the abandoned Elcor townsite, Inland Steel will conduct a field investigation to determine whether an abandoned open dump exists. Inland also will try to determine, through the Iron Range Historical Society, if any buried fuel oil tanks exist in the area, and will consult the Minnesota Pollution Control Agency regarding proper closure and disposal if such items are discovered.

The Department recommends that Inland Steel contact MPCA staff prior to the planned field investigations for any assistance or guidance the MPCA might offer.

- 4I | P.6-6: We strongly advise the use of the techniques listed in this section, with the exception of wetland treatment (see following comment).
- 4J | P.E-14 p.1-3: Natural wetlands are waters of the state, and any discharges to them must meet water quality standards. Their use as treatment systems must be approved and permitted by MPCA, and this is unlikely unless standards and effluent limitations can be met. If wetland-type treatment is indicated, constructed wetlands should be used.
- 4K | In general, abandoned mine pits which have filled with water should be referred to as "lakes," since they are no longer part of active operations and are now waters of the state.
- 4L | We believe the task force approach utilized in the preparation of this EIS has worked quite well for all involved. For the most part, issues were identified early and were able to be addressed in an orderly and straightforward way. We appreciate the opportunity to be involved, and in particular appreciate the open and constructive manner in which Inland Steel personnel approached this task.

Please continue to work with William J. Lynott of my staff as the EIS process moves forward to conclusion.

Sincerely,



Debra L. McGovern
Director
Environmental Analysis Office
Environmental Support Division

DLM:bh

cc: Jonathan Holmes, Inland Steel Mining Company
Tom Mighell, Northshield

RESPONSES, CONT.

- 4B | This comment is acknowledged by the DNR. In Section 2 of the Draft EIS, it is indicated that such a permit may be required.
- 4C | This comment is acknowledged by the DNR. The number of ore transportation alternatives to be considered in the EIS was reduced during the scoping process, which considered but dismissed rail and conveyor transportation methods as not feasible. The DNR Scoping Decision document, sent to all parties on the Minnesota Environmental Quality Board distribution list, outlined the alternatives dismissed and the alternatives that were to be addressed in the EIS. The DNR did not receive any comments on this aspect of the Scoping Decision.
- 4D | There likely is some groundwater inflow into the Mariska Pit along the upgradient side, especially during wet periods. On balance, however, the model suggests that the Mariska is a groundwater recharge area. This makes sense if

one considers the fact that precipitation normally exceeds open water evaporation by about 5 to 8 inches per year. Without a surface water outlet, this excess water must go to recharge groundwater.

- 4E** This comment is acknowledged by the DNR. The Department concurs that, as waters of the state, abandoned mine pits are subject to MPCA water quality rules.
- 4F** The City of Gilbert has a 1988 population of 2,105. The text in Section 4 of the Draft EIS has been corrected in Section 2 of this Final EIS.
- 4G** It normally takes about 8 to 10 years for abandoned pits on the Mesabi Range to fill with water. The rate of filling, however, varies considerably, depending on the surface and groundwater drainage areas intercepted by the pit. Some pits may fill in only 3 or 4 years, while others may take considerably longer than 10 years. A more accurate estimate can be made for mineland reclamation purposes, based on pit dewatering records.
- 4H** Figure 5.8 on page 5-37 of the Draft EIS reflects steady-state groundwater flow conditions for the project area, as simulated by the groundwater model. The flexure in the contours around the Mariska Pit are likely due to errors in the surveyed water elevation of the pit used in the model. The purpose of the pre-mining simulation of groundwater flow is to provide a reasonable baseline for assessing changes due to operation of the pit, and is not meant to be an unequivocal representation of current flow conditions.
- 4I** This comment and recommendation are acknowledged by the DNR. Comments and design recommendations related to regulatory requirements will be, with the publication of the Final EIS, provided to the project proposer and to various decision makers for their consideration in design and permitting decisions under their control.
- 4J** This comment and recommendation are acknowledged by the DNR. Comments and design recommendations related to regulatory requirements will be, with the publication of the Final EIS, provided to the project proposer and to various decision makers for their consideration in design and permitting decisions under their control.
- 4K** Abandoned mine pits filled with water can be labelled "lakes" if desirable for the MPCA's regulatory purposes. However, this label does not affect the application of DNR regulations for protection or management.
- 4L** This comment is acknowledged by the DNR. The Department appreciates the cooperation and participation of the MPCA as a member of the EIS Staff Review Team. The Department also will convey, with publication of the Final EIS, the MPCA's expressed appreciation for the manner in which Inland Steel personnel approached the task.



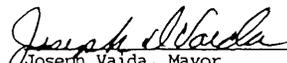
July 9 1990

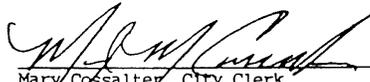
Ms. Rebecca A. Wooden
 Environmental Planner
 Office of Planning
 Dept. of Natural Resources
 500 Lafayette Road
 St Paul Minnesota 55155-4010

Dear Ms. Wooden:

- 5A | The City of McKinley, on behalf of the City Council and the residents of the City, wish to go on record in opposition to the Inland Steel mine expansion as it affects former trunk Highway #135 which provided access to the City of McKinley from Gilbert. The City of McKinley has a constitutional right of reasonable access to other Cities on Highway #135. If this roadway is cut off due to mine expansion, the only access for the City of McKinley will be through CSAH #20. This is a very unreliable source of access for the City and it's residents because there are two (2) different major railroads crossing on this roadway. Further, as most of the access for City residents is toward Gilbert and Virginia, old trunk Highway #135 is the primary access route in and out of the City. The Virginia Regional Medical Center is located approximately six (6) miles to the west of McKinley. Response time by emergency vehicles will be substantially impeded if their only access to the City is by way of CSAH #20. It should be further noted that school bus transportation runs from McKinley to Gilbert, not in another direction.
- 5B |
- 5C | Assuming the intent of the mining expansion is to close old Highway #135, it is incumbent on the State of Minnesota and the Department of Transportation to provide reasonable and reliable access for the City of McKinley to communities to the West of the City.

Sincerely,


 Joseph Vaida, Mayor
 City of McKinley


 Mary Cossalter, City Clerk
 City of McKinley

CC: Tom Rukavina
 Governor Rudy Perpich
 MN Department of Transportation
 Inland Steel Mining Co
 Ron Dicklich

RESPONSES

3.1.5 The Honorable Joseph Vaida, Mayor, and Ms. Mary Cossalter, City Clerk, Representing the City of McKinley

5A This comment is acknowledged by the DNR. In anticipation of mining activity, the Minnesota Department of Transportation closed and abandoned former Trunk Highway 135. The Draft EIS acknowledges that the road is still used by some McKinley residents for travel to Gilbert, and that some inconvenience may be incurred by these residents when the road is physically closed.

According to the Minnesota Environmental Policy Act, an EIS is to describe the proposed action in detail, analyze significant environmental impacts, discuss appropriate alternatives to the proposed action and their impacts, and explore

methods by which adverse environmental impacts of an action could be mitigated (Minnesota Statutes 116D.04, subdivision 2a). The EIS does not determine whether a project should be allowed to proceed. Comments related to the merits of the proposed project, as well as to future regulatory decisions, including the physical closure of abandoned Trunk Highway 135, will be, with the publication of the Final EIS, provided to the project proposer and to various decision makers for their further consideration.

- 5B** This comment is acknowledged by the DNR. It is the Department's understanding that CSAH 20 and Trunk Highway 135 have been legally determined to provide adequate access to the City of McKinley. Comments related to the City's view of what constitutes adequate access will be provided, by publication of the Final EIS, to the Department of Transportation and other decision makers for their consideration in regulatory decisions regarding the project.
- 5C** This comment is acknowledged by the DNR. See also the responses to Comments 5A and 5B in this section, which describe the purpose of an Environmental Impact Statement and the conveyance to regulatory decision makers of comments relating to the adequacy of access provided the City of McKinley by CSAH 20 and Trunk Highway 135.

MINNESOTA DEPARTMENT OF NATURAL RESOURCES

LAURENTIAN TACONITE MINE - DRAFT EIS

JULY 16, 1990 - GILBERT, MINNESOTA

DRAFT EIS COMMENT FORM

The Department will prepare a Final EIS for the Laurentian Taconite Mine, based on the comments received on the Draft EIS. We will appreciate receiving your comments on the Draft EIS. You may find it convenient to use this form to submit your written comments.

6

The City of McKinley objects to the lowering of the water level of Corsica Pit which would occur should the plans for the Laurentian Taconite Mine be approved. For further particulars please contact Mr. Dick Mitchell of Baker Engineering in Chisholm, MN.

Please leave this form with any of the DNR staff at the meeting, or mail it to:

Rebecca A. Wooden, Environmental Planner
NR Planning and Review Services
Minnesota DNR
500 Lafayette Road
St. Paul, MN 55155-4010

Comments on the Draft EIS must be received by Monday, July 30, 1990 at 4:30 P.M.

(Over)

RESPONSES

3.1.6 Ms. Mary Cossalter, City Clerk, Representing the City of McKinley

6 The Draft EIS thoroughly evaluates the proposed project's possible effects on water levels in the Corsica Pit, the source of McKinley's drinking water. The Draft EIS recommends monitoring to evaluate any changes in Corsica Pit water levels due to the proposed project. The Draft EIS also indicates that some adjustment to the McKinley water supply intake structure could become necessary.

Specific Laurentian Pit dewatering requirements will be detailed in the water appropriation permit the DNR will issue to Inland Steel Mining Company for the proposed project. Comments related to permitting requirements will be, with the

publication of the Final EIS, provided to the project proposer and to various decision makers for their consideration in regulatory decisions under their control.

See also the response to Comment 9 in Final EIS Section 3.1.9 for further information regarding the water appropriation permit.

MINNESOTA DEPARTMENT OF NATURAL RESOURCES

LAURENTIAN TACONITE MINE - DRAFT EIS

JULY 16, 1990 - GILBERT, MINNESOTA

DRAFT EIS COMMENT FORM

The Department will prepare a Final EIS for the Laurentian Taconite Mine, based on the comments received on the Draft EIS. We will appreciate receiving your comments on the Draft EIS. You may find it convenient to use this form to submit your written comments.

7

The City of McKinley objects to the placement of the proposed dumping site of the Laurentian Taconite Mine. The proposed areas is much to close to the homes within the City of McKinley and would greatly contribute to extensive dust and noise pollution.

Please leave this form with any of the DNR staff at the meeting, or mail it to:

Rebecca A. Wooden, Environmental Planner
NR Planning and Review Services
Minnesota DNR
500 Lafayette Road
St. Paul, MN 55155-4010

Comments on the Draft EIS must be received by Monday, July 30, 1990 at 4:30 P.M.

(Over)

RESPONSES

3.1.7 Ms. Mary Cossalter, City Clerk, Representing the City of McKinley

7 In 1980 the Department of Natural Resources established mineland reclamation regulations, which apply to taconite mining operations. These regulations, in part, address the siting of mining facilities. In general, the rules require that mining landforms (pits, stockpiles of rock or surface overburden, tailings basins, etc.) not be placed within 500 feet of an occupied dwelling, unless allowed by the owner. The 500-foot distance was selected in order to reduce impacts on adjacent land owners to generally acceptable levels.

As indicated in the Draft EIS, the facility that will be nearest to McKinley is a waste rock stockpile located approximately 2,750 feet from the nearest residence.

This distance greatly exceeds the minimum 500-foot setback contained in the mineland reclamation rules. Assuming that mining is conducted in accordance with the design and scheduling plans that have been presented by the project proposer, the siting of facilities would be in full compliance with these rules.

Regarding fugitive dust from the proposed stockpiles, under the terms of the Minnesota Pollution Control Agency (MPCA) fugitive dust rule, Inland Steel is required by its air quality permit to have a fugitive dust control plan. This plan requires the company to take reasonable methods to minimize avoidable amounts of fugitive dust emissions. The company does this by means of treating roads with water or chemicals, revegetation, and control of dust-producing activities during unfavorable weather conditions. At present, the company's plan calls for initiation of revegetation activities within two years of cessation of disturbance in a given area. MPCA staff have indicated that they will consider requiring revegetation to commence within one year after stockpiling begins.

Regarding noise, MPCA rules require that intermittent noise sources do not produce noise above 65 decibels for more than 10 percent (six minutes) of any hour in the daytime, and 55 decibels for more than 10 percent (six minutes) of any hour at night. Data included in the Draft EIS and analyzed by MPCA staff indicate that this level will not be exceeded in the City of McKinley from stockpiling activities at the Laurentian Mine. With the nearest stockpiling activity to be located more than 2,500 feet from the city proper, it is not likely that fugitive dust or noise will exceed State standards.

MINNESOTA DEPARTMENT OF NATURAL RESOURCES

LAURENTIAN TACONITE MINE - DRAFT EIS

JULY 16, 1990 - GILBERT, MINNESOTA

DRAFT EIS COMMENT FORM

The Department will prepare a Final EIS for the Laurentian Taconite Mine, based on the comments received on the Draft EIS. We will appreciate receiving your comments on the Draft EIS. You may find it convenient to use this form to submit your written comments.

8

The City of McKinley objects to the closing of Old Highway #135. The only other access in and out of town is county road #20. This road has two separate sets of railroad crossings on it. There has been times when the crossings have been blocked by problems with train and by problems with cross arm malfunctions. On one incident in May of 1987, the crossing was blocked by a train for appx. 45 minutes. On another day in the same month and year the crossing was blocked with the arms being stuck down for a length of time. There has been some talk of another access being made to the east of town, with emergency vehicles and schools to the west an access to the east would not be acceptable.

We will try to have more information on the blocking of the railway crossings at the meeting we set up for August 15th.

Please leave this form with any of the DNR staff at the meeting, or mail it to:

Rebecca A. Wooden, Environmental Planner
 NR Planning and Review Services
 Minnesota DNR
 500 Lafayette Road
 St. Paul, MN 55155-4010

Comments on the Draft EIS must be received by Monday, July 30, 1990 at 4:30 P.M.

(Over)

RESPONSES

3.1.8 Ms. Mary Cossalter, City Clerk, Representing the City of McKinley

8 This comment is acknowledged by the DNR. See also the responses to Comments 5A and 5B in Final EIS Section 3.1.5, which respond to similar comments also submitted by Ms. Cossalter.

In the Final EIS, the Department will respond to timely substantive comments on the draft EIS consistent with the scoping decision. Any person submitting substantive comments on the Draft EIS will receive a copy of the Final EIS, as well as the EIS Adequacy Decision. To receive a copy of these documents, please supply your name and mailing address:

Name: CITY OF MCKINLEY
Address: P O BOX "B"
City, State, Zip: MCKINLEY MINNESOTA 55761 ATTN: MARY COSSALTER

Please use additional sheets if you need more space. Thank you for your help.



City of McKinley

MCKINLEY, MINNESOTA 55761

July 27 1990

Dear Ms Rebecca Wooden:

Enclosed please find additional information from the City's Engineer on our water supply system.

Mary M Cossalter
City Clerk



JOHN BAKER ENGINEERING, Inc.

Highway 73 & 3rd Street Southwest - Post Office Box 152
CHISHOLM, MINNESOTA 55719

Phone A. C. 218/254 - 5793

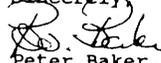
22 July, 90

Mr. Joe Vaida, Mayor
City of McKinley
City Hall
McKinley, MN

Re: Raw water intake, Corsica Mine

9 | We have reviewed the existing conditions at the city's water intake in the Corsica Mine with regard to the proposal to lower the mine water level. The intake system was designed and built to accommodate stable or rising water levels, as previous conditions indicated a continuous rise in pit water levels. An as built plan of the intake is enclosed here. Note that the critical dimension is the 4.2 foot elevation difference between the existing water level, and the elevation of the check valve at the end of the pump column. Reducing the water level will decrease the effective depth above the pump column. As long as the pump suction is under water this would in theory not affect the pump operation, but there should be some margin for safety. We recommend allowing at least 3 feet of water level above the check valve elevation to provide a reasonable safety precaution. Any further drop in water elevations could affect the operation of the municipal water supply.

The Minnesota Health Department rules specify that municipal water supply is the highest priority for public waters, and any proposals to lower water levels in the Corsica mine pit should be carefully evaluated. Variable climatic conditions combined with mine dewatering could produce unexpected impacts on the water level and could adversely affect the municipal water supply for the City of McKinley. Please let me know if you have further questions.

Sincerely,

Peter Baker, P.E.

enc.

"MUNICIPAL & CONSTRUCTION ENGINEERING SERVICES"

RESPONSES

3.1.9 Ms. Mary Cossalter, City Clerk, Representing the City of McKinley

9 | The Department has received the drawings and information developed by John Baker Engineering, Inc. This information contains the recommendation that a minimum of 3.0 feet of water be maintained above the pump check valve. This recommendation will be useful in developing a monitoring program for the Corsica Pit. Inland Steel will be issued an appropriation permit from the DNR. This permit will authorize dewatering of the Laurentian Mine Pit according to prescribed provisions. The provisions will require Inland Steel to monitor Corsica water level fluctuations before significant dewatering begins for the Laurentian Mine, and continue monitoring during active dewatering. If dewatering the

Laurentian Mine Pit causes the Corsica Pit water level to drop below the recommended level, Inland Steel will be responsible for lowering McKinley's water intake structure.

See also the response to Comment 6 in Final EIS Section 3.1.6, which responds to a similar comment submitted by Ms. Cossalter.



United States Department of the Interior



FISH AND WILDLIFE SERVICE

ST. PAUL FIELD OFFICE (ES)
50 Park Square Court
400 Sibley Street
St. Paul, Minnesota 55101

IN REPLY REFER TO:

SPFO

July 16, 1990



Department of Natural Resources
Office of Planning
Attention: Rebecca Wooden
500 Lafayette Road
Saint Paul, Minnesota 55155-4010

Dear Ms. Wooden:

This letter provides the review comments of the U.S. Fish and Wildlife Service for the Draft Environmental Impact Statement (DEIS) on the subject of the Laurentian Taconite Mine, in the City of Gilbert, Minnesota. The following comments are based upon our review of the DEIS, information provided during a project review meeting held by the Department of Natural Resources last April, and the July 12, 1990, on-site review of the affected environment with Department of Natural Resources personnel, Inland Steel Mining Company personnel, and a representative of the U.S. Environmental Protection Agency.

Proposed Action

In brief, the Inland Steel Mining Company has proposed to open a new pit near the City of Gilbert so that taconite (iron) mining can continue once the company's existing resources at the Minorca Mine are depleted. The Minorca Mine is expected to be closed sometime soon after 1992. The Inland Steel Mining Company wants to continue to use the existing taconite plant at the Minorca Mine site to process the ore recovered from the proposed Laurentian Mine site. To do so will require both the transport of the raw, ore-bearing material to the Minorca Mine plant and establishment of a 600-acre waste rock storage area near the new pit. The transportation and waste rock storage features of the proposed plan are the focus of our concern.

Project Alternatives

The Minnesota Environmental Quality Board procedures for environmental documentation includes the preliminary evaluation of alternatives during the Environmental Assessment Worksheet (EAW) phase of the planning process. It was during this phase of the planning process that several ore transport alternatives were considered and all but the single haul road (proposed action) alternative were adjudged to be not feasible and eliminated from further consideration in the planning process. The use of a railroad, and the use of a conveyor belt for ore transport were considered, along with various haul road alignments.

RESPONSES

3.1.10 U.S. Fish and Wildlife Service (USFWS)

10A Evaluation of a rail haul alternative is beyond the scope of this EIS. See also the response to Comment 10G in this section, which describes the EIS scoping process in further detail.

In addition, the project proposer has indicated that the railroad alternative has never been held to be economically feasible over the life of the project, from either capital investment or operating cost viewpoints.

- 10A** | The railroad and conveyor belt alternatives were held to be economically feasible over the life of the project, but they would require a large initial capital investment and were thus found to be unacceptable to the proposer.
- 10B** | Similarly, but for various reasons, alternative haul road alignments were held to be either unacceptable or undesirable by the proposer.

General Comments

- 10C** | The proposed action for the haul road will severely impact the Pike River Valley environment. The proposed alignment will bisect the river valley which, except for some timber harvest activity, is basically undisturbed and exists in stark contrast to the vast waste rock stock piles and abandoned pits that surround the valley on three sides. An alternative alignment can be drawn that courses the south and west rim of the Pike River watershed and remains contiguous with areas that have already been severely disturbed by mining activity and adds but a minor increase in the length of the haul road.
- 10D** | Some of the property along this route is owned by a competitor, but it is our understanding that this property is now up for sale. This alternative would dramatically reduce the impact on undisturbed lands and it would substantially reduce impact on wetlands, including the native sedge meadows of the Pike River Valley. This alternative is feasible from a cost and technology standpoint, but it is not held to be as cost-effective as the proposed action and so it is apparently unacceptable to the applicant. In addition, the proposed haul road is presently designed to cross the broad wetlands of the Pike River floodplain on fill, with a single 72-inch diameter corrugated metal pipe provided for channel flows. At the very least, we would vehemently object to the issuance of a permit for such a project. Where the road is not a water-dependent facility, we have consistently recommended the use of bridge work and piles to reduce the unnecessary impact to wetlands, floodplains, and flowing channels. The cost of such a structure for passenger vehicle traffic is substantial, but it is the cost of doing business in a responsible manner. The cost of a bridge that must support giant ore-hauling trucks (\pm 400 tons when loaded) would be enormous, and such a cost increase would likely affect the proposer's selection of a preferred alternative.
- 10E** |
- 10F** | The use of a railroad system to transport the ore from the Laurentian Mine to the Minorca Mine is feasible, but not acceptable to the proposer due primarily to the need for initial capital investment.
- There exists a DM & IR railroad line that runs from the dead-center of the proposed Laurentian Mine west and north to within one mile of the proposer's property line at the Minorca Mine, and a route exists around the east side of the pit that is suitable for rail line extension without the need of massive trestle work to reach the Minorca processing plant. It is worth noting here that the DM & IR Railroad has declared their intention to discontinue the use of this rail line. It could be assumed that the present owner would be willing to sell the rail line and appurtenant facilities to the proposer at a reasonable price, given the economic conditions of the ore-freighting railroad business today.
- 10G** |

RESPONSES, CONT.

- 10B** | Throughout the EIS preparation process, Inland Steel Mining Company has been open to consideration of alternative haul road alignments. The company submits, however, that it must consider issues of economics and land ownership when evaluating alignment alternatives.

See also Final EIS Section 2.4 as well as the responses to Comments 2A and 2D in Final EIS Section 3.1.2, which discuss further the factors that need to be considered in haul road alignment selection.

10G Further, in reviewing the summary data provided in Appendix B of the DEIS, and in light of the information provided by the proposer at the July 12 site review, we believe that a complete reexamination of the alternatives evaluation process is in order. For one thing, the statement is made that "Operating cost for rail are \$3.00 higher per ton of processed pellets than truck costs." Nothing regarding the proposed action would affect how processed pellets are now being hauled - which is by rail. The hauling of raw ore is another matter. A normal, highway-type truck can haul taconite pellets. The hauling of raw, ore-bearing rock from a pit to a plant requires an ore hauler, and the costs of operating an ore hauler (in tons per mile) are likely to be substantially greater than a normal truck. The comparison for cost analysis purposes is not valid. In addition, the proposer is reportedly going to go ahead with a conveyor system shortly after operations begin and that now creates a whole new scenario for cost analysis purposes. Adding the conveyor system costs to the truck system makes the preferred alternative now cost approximately \$42 million dollars - or nearly twice the cost of acquiring and improving the DM & IR railroad that already exists, and nearly 60 percent more than the cost of establishing a brand new railroad system - which is apparently the approach that was used in this economic analysis.

10H

The Waste Rock Spoil and Storage Zone

The proposed action calls for the use of a 600-acre area adjacent to the Laurentian Pit for the storage of low grade ore, and the disposal of waste rock and overburden. The designated zone for this purpose is a mix of wetlands, and upland forest. The existing conditions of this area can be described as medium to high quality for fish and wildlife resources, showing some signs of past attempts to mine, timber harvest, or develop these lands. However, the quality of these resources is still worth protection from avoidable impacts.

10I

Two methods that might reduce impacts with storage are as follows:

- 10J | 1. All wetlands, with a minimum of a 250-foot wide buffer zone, shall be avoided. These areas are to include all wetlands such as palustrine emergent, palustrine open water, palustrine forested and all riverine wetlands. These wetland complexes play an important role in the health and stability of the headwaters of the Pike River and no amount of man-made wetlands created elsewhere can truly mitigate for these wetland values.
- 10K |
- 10L | 2. With the establishment of the DM & IR railroad as the preferred transport alternative, this material can be readily hauled and deposited in and among any of several abandoned open pits that the existing railroad winds through on its way toward the Minorca Mine or even in the Minorca Mine itself. This would substantially reduce the amount of open space needed for disposal adjacent to the Laurentian Pit while causing a relatively minor increase in handling and storage costs. The selection of this alternative would substantially reduce the adverse environmental effects of the proposed action.

RESPONSES, CONT.

- 10C This comment is acknowledged by the DNR. The Draft EIS provides a thorough discussion of the impacts to the Pike River Valley that would be expected from the haul road alignment proposed by Inland Steel. The Draft EIS also includes measures to reduce potential environmental impacts.
- 10D The Department concurs that Haul Road Alignment Alternative #3 would impact fewer acres of wetland (5 acres) than the proposed alignment (10 acres). These acreage impacts are fully discussed in the Draft EIS. The Draft EIS also presents two other possible haul road alignments, one (#2) that also would impact 4.5 acres of wetland, and another (#1) that would impact 6 acres of wetland. In addition, the company has continued to research additional haul road alignments that might reduce the impacts to wetlands even further.

Endangered Species Comments

Under Section 7(c) of the Endangered Species Act, Federal agencies are required to obtain information from the Fish and Wildlife Service concerning any species, listed or proposed to be listed, which may be present in the area of a proposed action. Therefore, we are sending you the following list of species which may be present in the concerned area:

<u>Common Name</u>	<u>Scientific Name</u>	<u>Status</u>
bald eagle	<u>Haliaeetus leucocephalus</u>	Threatened
gray wolf	<u>Canis lupus</u>	Threatened
peregrine falcon	<u>Falco peregrinus</u>	Endangered

10M

The nature of the subject project indicates that diurnal perches, roost sites, food sources, or other preferred habitat will not be affected. Therefore, the project will not affect the bald eagle or the peregrine falcon. This precludes further action on this project as required under Section 7 of the Endangered Species Act of 1973, as amended for these species. Should this project be modified or new information indicate listed species may be affected, consultation should be reinitiated. The Eastern Timber Wolf Recovery Plan identifies that the gray wolf should thrive in areas of Minnesota where human density and access are relatively limited. The proposed haul road could, and likely would provide for enhanced human access into existing wolf habitat. While the EIS does provide a recognition of this concern (Page 5-8, Item 6), the EIS should address this concern and any mitigative features in greater specificity. Until such time as the specific plans and requirements are detailed as formal conditions of permit issuance, we do not concur with the presumption that the proposed action will not affect the wolf.

10N

We appreciate this opportunity to provide our comments on this Draft EIS. If we can be of further assistance, please contact this office at your convenience.

Sincerely,



James L. Smith
Assistant Field Supervisor

cc: Ted Rockwell, U.S. Environmental Protection Agency, St. Paul, MN

RESPONSES, CONT.

The Department also concurs that Haul Road Alignment Alternative #3 would traverse land that is more disturbed by previous mining activities than the three other routes previously mentioned. However, the area that would be crossed by these routes (the originally proposed alignment, or alternative alignments #1 and #2) is also undergoing disturbance through intensive logging activity unrelated to the proposed project.

As indicated in the Draft EIS, and at several meetings with a representative of the USFWS, the project proposer and various permitting authorities must consider many factors in addition to 1) wetlands and 2) whether the route traverses landscapes that are severely disturbed versus moderately disturbed by previous human activity. Included among these factors is compliance with existing state

rules, which Haul Road Alignment Alternative #3 would not achieve, and impacts (noise, dust, and vibration) to nearby residents. These concerns are outlined in greater detail in the responses to comments found in Final EIS sections 3.1.2 and 3.1.3.

It should also be noted that at the public meeting held in Gilbert, Minnesota (refer to Final EIS Section 3.2.1), Mayor Oberstar indicated that the City of Gilbert would not approve a zoning change required for project implementation so long as Haul Road Alignment Alternative #3 remains under consideration.

Regarding the USFWS comment that the project proposer holds Haul Road Alignment Alternative #3 to be cost-ineffective, the alignment crosses several properties that Inland Steel does not own. Part of the route runs through an area owned by the East Mesaba Sanitary Disposal Authority. Since that area is being used for sludge disposal for the various sewage treatment plants in the area, the disposal authority will not grant an easement for a haul road crossing.

The USFWS indicates that Haul Road Alignment Alternative #3 is feasible from a cost and technology standpoint. No evidence has been presented that the USFWS has done any studies to support this position. From a regulatory standpoint, this alternative would be in violation of the siting section of the DNR's mineland reclamation regulations. The reclamation rules in general require that mining activities not be conducted within 500 feet of occupied dwellings, unless allowed by the owner of the dwelling to do so.

Unfavorable land ownership, proximity to the City of Gilbert, non-compliance with mineland reclamation rules, likely violation of air quality standards, local opposition, and engineering difficulties associated with crossing abandoned mine pits and stockpiles combine to make the feasibility of constructing Haul Road Alignment Alternative #3 extremely limited.

Refer also to Final EIS Section 2.4. This section contains revised Draft EIS Section 6, pages 6-15 to 6-18, which was revised to include additional information pertaining to alternative haul road routes.

- 10E** This comment is acknowledged by the DNR. Recommendations relating to project design changes and permitting will be conveyed, with publication of the Final EIS, to both the project proposer and to decision makers for their consideration in regulatory decisions relating to the proposed project.
- 10F** This comment is a partial restatement of Comment 10A, the response to which can be found earlier in this section.

The DNR acknowledges this comment, which includes a USFWS analysis of the feasibility of rail haul of crude taconite ore. Pursuant to Minnesota Rules part 4410.2700, the issue of a rail haul alternative is beyond the scope of this EIS.

The Environmental Quality Board (EQB) rules for the state Environmental Review Program require that the Final EIS respond to timely substantive comments on the Draft EIS consistent with the Scoping Decision document, and discuss responsible opposing views relating to scoped issues that are not adequately discussed in the Draft EIS, identifying the position of the Responsible Governmental Unit on such issues (Minnesota Rules part 4410.2700, subpart 1). When the DNR, as the RGU, determines whether the Final EIS is adequate, that decision is based on whether the Final EIS (1) addresses the issues raised in scoping so that all issues for which information can reasonably be obtained have been analyzed, and (2) provides responses to the substantive comments received during the Draft EIS review concerning issues raised during the Scoping Process (Minnesota Rules part 4410.2700, subpart 4).

The number of ore transportation alternatives to be considered in the EIS was reduced during the scoping process, which considered but dismissed rail and conveyor transportation methods as not feasible. The DNR Scoping Decision document, sent to all parties on the Minnesota Environmental Quality Board distribution list, outlined the alternatives dismissed and the alternatives that were to be addressed in the EIS. Pursuant to Minnesota Rules 4410.1200 G., the Draft EIS includes a brief description of alternatives considered but dismissed during scoping, including the rail haul alternative. The DNR received no comments from the USFWS on the Scoping Decision.

The project proposer has provided the following information related to its analysis of rail haul feasibility, which is included here as a matter of convenience and information for readers.

"A detailed study of the railroad alternative was completed in 1988. Inland Steel requested a proposal from the DM&IR Railroad for the operating cost, equipment requirements, grade layout, and operating schedules for a railroad between the Laurentian Mine and the Minorca Taconite Plant. Although the existing rail line comes to within 2 miles of the Minorca Plant, an additional 5 miles would have to be constructed due to the elevation changes encountered. The operating cost increase using rail instead of a truck haul is approximately \$3.00 per ton of pellets, or \$7.5 million per year at the plant's current (annual) capacity of 2.5 million tons. It is obvious from the comment at the top of page 3 (of the USFWS comment letter) that this fact was totally misinterpreted by the USFWS. It would be very poor judgment for Inland Steel to choose a haulage method that cost \$10 million more to install, \$7.5 million more per year to operate, and that would also have to traverse land not owned by Inland Steel. Rail

haulage would make the entire Laurentian Project economically unfeasible."

- 10H** A discussion of a conveyor system alternative for crude ore haulage is beyond the scope of this EIS. This transportation alternative was considered and eliminated during scoping. See also the response to Comment 10G in this section which further explains the EIS scoping process, and the responsibilities of the DNR as the preparer of the Final EIS.

The project proposer has provided the following additional information on whether the company intends to pursue a conveyor option in the near term.

"Installation of a conveyor is not economically feasible at the present time due to the high capital cost. Inland has no definite plans to install a conveyor in the future. The earliest time a conveyor could even be considered is 1995-2000. Whether such a high cost capital expenditure would take place is dependent on the availability of capital, the payback on reduced haulage cost, and the state of the economy. Inland Steel may never put in a conveyor system. However, it would be desirable to align the proposed haul road along a route acceptable for a conveyor system to reduce the future costs and impacts of such a system."

- 10I** The DNR partially concurs with the USFWS in that it is the DNR's view that wetlands in the stockpile area are of medium (not high) quality for wildlife resources, although of no value to fish, and that ideally, where practical, they should be protected from impacts. Where impractical, as is the case in the stockpile area, the values provided can be replaced through mitigation projects. Wetlands of Types 2, 6, and 7 (shrub swamps, alder swamps, ash swale, and wet meadows) are present in the stockpile area. These wetlands are not unique and can be found in abundant supply throughout the project vicinity and northern Minnesota. For this reason, the Department does not concur with the USFWS assessment of impact severity.

The project proposer has expressed willingness to cooperate in mitigation, either by in-kind replacement, or by enhancing other wetlands. It is the Department's view that enhancement of existing Types 3 and 4 wetlands would be preferred, as these wetlands are of greater value to wildlife and are less abundant in the region.

- 10J** This comment is acknowledged by the DNR. It is not the Department's view that a 250-foot buffer around the small wetlands in the stockpile area would be an effective protection measure. In fact, such a buffer would serve to make the wetlands "catch basins" for runoff from surrounding stockpiles. Also refer to the response to Comment 10I in this section, which discusses wetland loss mitigation in further detail.

Also, comments related to project permitting will be conveyed, with the publication of the Final EIS, to both the project proposer and to decision makers for their consideration in regulatory decisions relating to the proposed project.

10K Wetlands in the proposed stockpile area are tributary to the Embarrass River, and therefore have no effect on the Pike River watershed.

10L The DNR notes the USFWS view that were a railroad established as the preferred alternative, it could be used to haul waste rock and overburden to be dumped into the mine pits on U.S. Steel property.

The DNR as the Responsible Governmental Unit does not select or designate a preferred alternative as part of the environmental review process. Also, as indicated in the Draft EIS and in the response to Comment 10G in this section, a railroad transportation alternative was eliminated from further consideration during scoping and is not within the scope of this EIS.

Of interest to the reader may be the following submission by the project proposer regarding the use of rail haulage to dump mine waste materials into abandoned pits.

"Dumping of waste materials into abandoned mine pits using rail haulage is impractical for a variety of reasons. First, the abandoned pits near the City of Virginia provide the water supply for the City. Contamination and destruction of that supply is not in the public interest. Second, several of those pits surround the East Rouchleau Taconite Reserve. Filling of those pits would render that Reserve uninhabitable. Third, the surface and mineral rights of the abandoned pits belong to various land and fee holders. Inland Steel owns no interest of any sort in those areas. Fourth, building railroad tracks next to the abandoned pits in order to dump waste materials into them would not be safe or practical. Five, the waste material would have to be double or even triple handled, requiring loaders and trucks on either end of the rail operation. The contention by the USFWS that this would cause 'a relatively minor increase in handling and storage costs' is totally unsubstantiated."

10M The DNR notes these comments.

10N The DNR notes the concern expressed by the USFWS that the proposed haul road would likely provide for enhanced human access into existing wolf habitat. Although the public often uses abandoned, or infrequently used, mine company roads located on the periphery of mining areas, this has not been the case on major transportation networks (such as the proposed haul road) located within active mine areas. The proposed haul road would be closed to employee commuting as well. Therefore, during the operating life of the mine, there is little likelihood that the general public would impact the wolf to any greater

degree than might currently exist as a result of activities presently supported by the area.

With construction of the haul road, the project area will remain below the 1 linear mile of road per square mile of land area density that the DNR uses as the tolerance limit for wolves.

There is a concern that, upon abandonment, the haul road could provide access to greater numbers of people than if the road did not exist. The rules and regulations dealing with mineland reclamation address this situation, and require removal of roads when operations cease. One proviso currently exists within this regulation which would allow that certain roads necessary for access (as determined by the commissioner) be left intact. The purpose of this language is to maintain a system of roads to supply access for emergency purposes (into a water-filled pit lake, for example) or to allow continued maintenance and monitoring of the mine area. The DNR currently cannot envision that the proposed haul road would be necessary to meet these needs. Therefore, the DNR is likely to stipulate, within its Permit to Mine, that the haul road be reclaimed upon completion of mining.

Office Memorandum

DATE : July 30, 1990

TO : Rebecca Wooden
Office of Planning
Department of Natural Resources

FROM : James F. Walsh, Hydrologist *JFW*
Well Management Unit
Section of Water Supply and Well Management

PHONE : 627-5138

SUBJECT : Proposed Laurentian Taconite Mine Draft Environmental Impact Statement (EIS)

I have reviewed the EIS referenced above and offer the following comments:

11A

1. Pursuant to Minnesota Statutes, Chapter 103I, dewatering wells greater than 25 feet in depth may only be constructed by a licensed well contractor or dewatering well contractor. Additionally, permits will be required for the construction of dewatering wells greater than 45 feet in depth.

11B

2. Exploratory borings drilled outside of the permit to mine area as issued by the Department of Natural Resources must be in accordance with the regulations set forth in Minnesota Statutes, Chapter 103I, and Minnesota Rules, Chapter 4727.

If you have any questions regarding the comments noted above, please contact me.

JFW:ter

RESPONSES**3.1.11 Minnesota Department of Health**

11A Inland Steel Mining Company does not anticipate the construction of dewatering wells at this time. The company has indicated that it will comply with all applicable regulations should such wells become necessary in the future. Comments related to project regulation and permitting will be conveyed, through publication of the Final EIS, to the project proposer and various decision makers for their consideration in regulatory decisions under their control.

11B This comment is acknowledged by the DNR. Comments related to future regulation and permitting will be conveyed, through publication of the Final EIS, to the project proposer and various decision makers for their consideration in regulatory decisions under their control.

CITY OF GILBERT
BOX 548
GILBERT, MINNESOTA 55741
TELEPHONE: (218)741-9443



July 25, 1990

Rebecca A. Wooden, Environmental Planner
Minnesota Department of Natural Resources
500 Lafayette Road, St. Paul MN 55155-4010

Dear Ms. Wooden:

12A | A public information meeting was recently held in Gilbert to receive comments on the draft EIS for the Inland Steel Mining Company to develop the Laurentian Taconite Mine near the City of Gilbert. Several citizens of Gilbert were present at the hearing to express concern for the project, primarily with the possible selection of alternate number three as the haul road location. This would place the road very near the residential section of the City of Gilbert and serious and realistic concerns were raised by those people in attendance. Although the City Council has no objection to the proposed project, The Council would like to see all Agencies involved eliminate Alternate number three as the haul road. The Council would like to go on record as supporting the original proposed route noting this would have the most minimal impact on the area and also be the most direct route for the road.

12B | The Council also is concerned with the impact of noise levels, dust, Lake Ore-Be-Gone's water levels, and particularly the impact of the operation on the City's Wastewater Treatment Plant which would be possibly the closest building to the actual mining operation. The Council would like to have the assurances that the noise, water and air quality would be closely monitored as well as monitoring of blasting effects particularly at the Wastewater Treatment Plant and the homes of the closest residences to the Project.

12D | In closing, the City Council requests that all agencies do everything in their power to protect the City of Gilbert and our residents from any detrimental effects caused by the proposed project.

Thank you for all your considerations.

Sincerely,

Karl Oberstar, Jr. Mayor *Karl Oberstar, Jr.*
Dennis Sandstrom, Councillor *Dennis Sandstrom*
Herbert Clapsaddle, Councillor *Herbert Clapsaddle*
Marco Biondich, Councillor *Marco Biondich*
Joseph Gentile, Councillor

RESPONSES

3.1.12 Mayor Karl Oberstar, Jr., and Councillors Dennis Sandstrom, Herbert Clapsaddle, Marco Biondich, and Joseph Gentile, Representing the Gilbert City Council

12A | These comments, concerns, and recommendations are acknowledged by the DNR. Comments related to permitting will be conveyed, through publication of the Final EIS, to the project proposer and various decision makers for their consideration in regulatory decisions under their control.

See also Final EIS Section 2.4, as well as the responses to comments 2A through 2E and Comment 10D in Final EIS sections 3.1.2 and 3.1.10, respectively, which include a more detailed discussion of various alternative haul road alignments.

12B These comments and concerns are acknowledged by the DNR. The Draft EIS is thorough in its evaluation of potential impacts from the proposed project.

12C The project proposer has indicated that the company is committed to monitoring environmental impacts as required by various permits. If damage were to occur to public or private structures from blasting at the Laurentian Mine, Inland Steel would be responsible for restitution.

Comments related to permitting and permit monitoring will be conveyed, through publication of the Final EIS, to the project proposer and various decision makers for their consideration in regulatory decisions under their control.

12D This comment and request are acknowledged by the DNR. Comments relating to the permitting process will be conveyed, with the publication of the Final EIS, to both the project proposer and decision makers for their consideration in regulatory decisions relating to the proposed project.

MINNESOTA DEPARTMENT OF NATURAL RESOURCES

LAURENTIAN TACONITE MINE - DRAFT EIS

JULY 16, 1990 - GILBERT, MINNESOTA

DRAFT EIS COMMENT FORM



The Department will prepare a Final EIS for the Laurentian Taconite Mine, based on the comments received on the Draft EIS. We will appreciate receiving your comments on the Draft EIS. You may find it convenient to use this form to submit your written comments.

13

I am opposed to alternate route #3 from the Laurentian Taconite Mine Draft EIS. The noise and dust factor would increase multi times compared to the other routes proposed. Let's consider the human element in making these descision. The wet and wildlife area disturbed would be minuscule if alternate route ~~#3~~ ^{is} adopted. The human factor would suffer immensely with the increased amount of dust and noise if alternate route #3 is adopted. Putting this route to the original or route #2 and I would at least put part of a natural barrier against the ~~dust~~ ^{dust} and noise, also moving the road easterly 6000feet from Route #3 would create a natural barrier that ~~could subdue some of the noise and dust before entering any residential area.~~ ^{could subdue some of the noise and dust before entering any residential area.}

Please leave this form with any of the DNR staff at the meeting, or mail it to:

Rebecca A. Wooden, Environmental Planner
 NR Planning and Review Services
 Minnesota DNR
 500 Lafayette Road
 St. Paul, MN 55155-4010

Comments on the Draft EIS must be received by Monday, July 30, 1990 at 4:30 P.M.

(Over)

RESPONSES

3.1.13 Mr. Thomas Juth

13 This comment is acknowledged by the DNR. See also the responses to comments 2A through 2E and Comment 10D in Final EIS sections 3.1.2 and 3.1.10, respectively, which include more detailed discussion of Haul Road Alignment Alternative #3.

In the Final EIS, the Department will respond to timely substantive comments on the draft EIS consistent with the scoping decision. Any person submitting substantive comments on the Draft EIS will receive a copy of the Final EIS, as well as the EIS Adequacy Decision. To receive a copy of these documents, please supply your name and mailing address:

Name: ~~Thomas J. Juth~~ Thomas J. Juth
Address: 10 West Michigan Box 744
City, State, Zip: Gilbert Mn 55741-0744

Thomas J. Juth

Please use additional sheets if you need more space. Thank you for your help.

Mrs. Sandra Wiermaa
6284 Wahleten Rd
Tower, MN 55790

July 30, 1990

Rebecca Wooden--Planning and Revue Services
500 LaFayette Rd Fax 612-296-3500
St. Paul, MN 55155
Re: Laurenten Mine Pit- Pike River haul road proposal



Dear Ms. Wooden,

Thankyou for extending the time limit for public comment by 2 days . The Tower area has not been aware that Pike River is involved in the Laurenten Pit proposal. Pike River drains into Lake Vermillion, Tower is next to the lake.

We live on Pike River and there seems to be a double standard here. Our home-owners have to get variances to build within 300' of the river, even cutting brush and trees next to it is prohibited. Many of the forty-lines cross the river and we have to pay taxes on the river bottom land. We

14A

cannot develop that river-bottom land, nor can we throw a culvert in it to cross to the other side. Why should the mining companies be allowed to, destroying wetland property in their actions. Sure wetlands can be replaced with other wetlands, but they all drain into the river irregardless who owns them. The destroyed areas just make the total smaller. This river is a state protected water and wetland's area what good is it doing in regards to the mining companies.

I feel we must be concerned with the contents of the waste piles & stock piles, along with the haul road. Will the run-off contain sulfides and nickle to further contaminate our river and lake. Considering the mine has a 40 year potential, 40 years of huling could turn Pike River into an acid pipeline to Lake Vermillion.

14B

Fresh water is Minnesota's greatest asset, protect it!

*Respectfully,
Sandra Wiermaa*

RESPONSES

3.1.14 Mrs. Sandra Wiermaa

14A The DNR regulates activities occurring below the Ordinary High Water Level, which would be the top of the river bank for most rivers. The standards in the DNR Division of Waters' Permits Program rules, pursuant to Minnesota Statutes Section 105.42, would have to be met for the river crossing that is part of the proposed project. Any landowner can request a DNR permit to cross a watercourse, unrestricted by the type of land use present. The rules mandate that the DNR explore alternatives available to the landowner and the impacts to the

resource. When permit approval is justified, the DNR has the authority to require mitigation for an impacted waterbody.

This comment relates primarily to permitting, and as such will be, with publication of the Final EIS, provided to various decision makers for their consideration in regulatory decisions under their control.

14B

It is indicated on Page 4-38 of the Draft EIS that the waste rock resulting from the project would have an extremely low sulfur content. Chemical assay data for the Laurentian Reserve waste rock indicate elemental sulfur content of .072 percent, by weight. Nickel is present as a trace element, at 0.001 percent, by weight. Sulfide minerals were not detected in a mineral balance data analysis. Inland Steel was advised by the investigating laboratory that a more detailed microscopic study would be required to identify trace level sulfide minerals. Stockpile runoff would not contain measurable sulfides or nickel. In addition, it is likely that both Minorca and Laurentian mine waste rock would be used to construct the haul road. After years of mining, there have been no sulfur-related problems associated with the Minorca waste rock.

MINNESOTA DEPARTMENT OF NATURAL RESOURCES

LAURENTIAN TACONITE MINE - DRAFT EIS

JULY 16, 1990 - GILBERT, MINNESOTA

DRAFT EIS COMMENT FORM



The Department will prepare a Final EIS for the Laurentian Taconite Mine, based on the comments received on the Draft EIS. We will appreciate receiving your comments on the Draft EIS. You may find it convenient to use this form to submit your written comments.

15A

I received this form from Rebecca Wooden at the Ironland Steel Open House in Iron Mountain, Minnesota Monday July 16 in Gilbert Mn St. Louis County. Some of the plants - wildflowers that would be protected under the Heritage Program was not done.

15B

4-85 of the Environmental Protection Study) she asked me to list wildflowers I had seen growing in this area. There is a small area located at the edge of the proposed pit that has many wildflowers. I have already asked Ironland Steel's Director of Mining Mr. J. Holmes if this area could be spared in their mining operation which is about to start in August or Sept of 1990. He has commented that since the area is close to the edge of the pit next to the old canal in Underground Mine they might

Please leave this form with any of the DNR staff at the meeting, or mail it to:

Rebecca A. Wooden, Environmental Planner
NR Planning and Review Services
Minnesota DNR
500 Lafayette Road
St. Paul, MN 55155-4010

Comments on the Draft EIS must be received by Monday, July 30, 1990 at 4:30 P.M.

(Over)

RESPONSES

3.1.15 Ms. Rosemary Norha

15A On page 4-85 of the Draft EIS, it is indicated that a complete biological survey of the project area has not been completed. As is also indicated in the Draft EIS, the proposed project area provides habitat appropriate to only two state-listed plant species, barren strawberry (*Waldsteinia fragarioides*) and *Poa sylvestris*, of which the DNR Heritage Program indicates there are no reported occurrences.

The Department acknowledges the wide variety of common flower species included on the list submitted as part of this comment letter.

In the Final EIS, the Department will respond to timely substantive comments on the draft EIS consistent with the scoping decision. Any person submitting substantive comments on the Draft EIS will receive a copy of the Final EIS, as well as the EIS Adequacy Decision. To receive a copy of these documents, please supply your name and mailing address:

Name: Rosemary Norha Phone 215-965-6564
 Address: 4452 Robin Lake Drive
 City, State, Zip: Libert CO 80111

Please use additional sheets if you need more space. Thank you for your help.

be safe from the mining operations since they don't plan to mine in this area.

The following is a list of wild flowers that I have seen in this area. Flowers or plants I do not know figured the name and read about in my Palmer's Field Book of Natural History and some the spring. There are more that I cannot name or classify.

From Lily family

- 1 White Trillium
- 2 Short Urtica grandiflora
- 3 False Solomon Seal
- 4 Solomon Seal
- 5 Trillium

6 Yellow Bell Flower
 Ranunculus Family

7 Meadow Sweet
 8 (many) Blue-leaved Hepatica

- 9 Wild flower
- 10 Blue Throat
- 11 White Bone Seton
- 12 Red Penstemon
- 13 Galium
- 14 Anemone

- 15 Yellow Corn
- 16 Yellow Loose Strife
- 17 Red Strife

Arbutus
 were all seen in the area
 from the local area
 by anyone

I hope I can get some cooperation in this matter.
 Rosemary Norha

from the Heritage Program would come to Libert I would be ready to point out varieties of the city family and orchard that are protected by Federal law. Mr. John Holmes is concerned and may be with permission.

15C

RESPONSES, CONT.

15B The Department notes this comment. Mr. Jonathan Holmes of Inland Steel Mining Company has indicated that part of the area referred to is located near some water-filled subsidence areas caused by collapsed underground workings. These areas are located just outside the proposed pit boundaries, and would not be disturbed by mining or stockpiling. With publication of the Final EIS, Ms. Norha's comment will be conveyed to the project proposer for consideration in final project design and location decisions.

15C

Minnesota Statutes Section 17.23 regulates the commercial taking and transport of members of the orchid, trillium and lily families. These wildflowers cannot be transported to another location or sold without the written permission of the landowner and the Commissioner of the Department of Agriculture. Nothing in this section prohibits the landowner from disturbing or destroying the plants in any way. The only restriction placed upon the landowner is that he or she must register with the Department of Agriculture if the plants are to be sold or transported by the landowner to a location off the property.

Should Ms. Norha or any other citizen wish to initiate a salvage operation to remove and transplant any of the plants named in the statute, she or he must receive written permission from Inland Steel, and also request written permission from the Department of Agriculture by writing to:

Steve Shimek, Nursery Inspector
Minnesota Department of Agriculture
90 West Plato Boulevard
St. Paul, Minnesota 55107

Included with the request should be:

- A copy of the written permission from the landowner (Inland Steel)
- The legal description of both the area from which the plants are to be removed and the area to which they will be transplanted
- A description of the pending disturbance (e.g., a taconite mining operation)
- A list of how many of what plant species will be moved

MINNESOTA DEPARTMENT OF NATURAL RESOURCES
LAURENTIAN TACONITE MINE - DRAFT EIS



JULY 16, 1990 - GILBERT, MINNESOTA

DRAFT EIS COMMENT FORM

The Department will prepare a Final EIS for the Laurentian Taconite Mine, based on the comments received on the Draft EIS. We will appreciate receiving your comments on the Draft EIS. You may find it convenient to use this form to submit your written comments.

16A | 10 I understand the material on this enclosed copy. The Inland Mining Company would be breaking 17.23 - 17.34 (or the new ones) of the Conservation of certain wild flowers law if they continue with their present plans for the Laurentian mine near Gilbert. Just this spring and others have seen the flowers species that are to be protected by this law growing in the area where their pit and stockpiles are to be laid down. These include members of the orchid, trillium, and lily families. I am ready to point these out in the field or forest and we have made a video tape of one area because we wished to have a remembrance of what will soon be destroyed. This area with its natural veg, wild animals, springs, trails, alpine hills and rock ledges has been an easily accessible recreation area for us. Its colors were admired and photographed, hikes and hikes, hunters dogged its cool mass or snowcovered trails - depending on season. Bicycles and joggers used the close road # 39 highway. If the mining company is breaking

16B |

Please leave this form with any of the DNR staff at the meeting, or mail it to:

Rebecca A. Wooden, Environmental Planner
NR Planning and Review Services
Minnesota DNR
500 Lafayette Road
St. Paul, MN 55155-4010

Comments on the Draft EIS must be received by Monday, July 30, 1990 at 4:30 P.M.

(Over)

RESPONSES

3.1.16 Ms. Rosemary Norha

16A Inland Steel Mining Company would not be in violation of Minnesota Statutes Section 17.23 if the Laurentian Mine were developed as proposed. See also the response to Comment 15C in Final EIS Section 3.1.15, which further discusses this statute.

16B This comment is acknowledged by the DNR. The Draft EIS is thorough in its assessment of environmental impacts from the proposed project.

16C

-the law it is your ~~job~~^{job} to take action now then to
tell the Mining company about it. There could be
some natural reserve set up for these wild flowers
in this area. ~~Some~~ and some could be saved from
this mining^{ing} operation.

Rosemary Notha
4492 Baso Lake Road
Gilbert AZ 85741

RESPONSES, CONT.

- 16C These comments are noted by the DNR and will be conveyed, through publication of the Final EIS, to the project proposer for consideration in project design decisions.

WILD FLOWERS

17.23 CONSERVATION OF CERTAIN WILD FLOWERS.

Subdivision 1. **Prohibition.** No person within the state shall buy, sell, offer or expose for sale, the state flower (*Cypripedium reginae*), or any species of lady slipper (*Cypripediaceae*), or any member of the orchid family, trillium of any species, lotus (*Nelumbolutea*), gentian (*Gentiana*), arbutus (*Epigaea repens*), or any species of lilies (*Lilium*), or any thereof, dug, cut, plucked, pulled, or gathered in any manner from any public land or from the land of any private owner without the written consent of such owner or other occupant of such land, and then only upon written permission of the commissioner, and for scientific and herbarium purposes; except, that any persons may upon their own lands cultivate for sale and sell these flowers by registering the purpose to do the same with the commissioner.

Subd. 2. **Prosecution.** The commissioner is hereby authorized, and it shall be his duty, to administer this section, and when, by investigation, complaint or otherwise, it shall be made to appear that any person has violated any of the provisions of subdivision 1, it shall be his duty to assemble the facts and transmit the same to the attorney general, or, in the discretion of the commissioner, he may act through the county attorney of the county in which the violation was committed, whose duty it shall be to forthwith institute proceedings and prosecute the same against any person or persons charged with such violation. It is hereby made the duty of the county attorney to prosecute any and all cases submitted to him by the commissioner or the attorney general.

Subd. 3. **Punishment.** Any person who violates any of the provisions of subdivision 1 shall be guilty of a misdemeanor; and, upon conviction, shall be fined not less than \$10 and the costs of such prosecution nor more than \$50 and the costs of such prosecution, or in default of payment thereof shall be imprisoned in the county jail for not less than ten nor more than 30 days for each and every such conviction. All fines and money thus collected shall be deposited in the state treasury.

History: 1925 c 409 s 1-3; 1935 c 100 s 1 (10522-1, 10522-2, 10522-3)

17.24 Subdivision 1. [Renumbered 17.037]

Subd. 2. [Renumbered 17.037]

Subd. 3. [Repealed, 1961 c 128 s 20]

17.25 [Renumbered 17.042]

17.26 [Repealed, 1955 c 92 s 3]

17.27 [Repealed, 1955 c 92 s 3]

17.28 [Renumbered 308.92]

17.29 Subdivision 1. [Renumbered 17.181]

Subd. 2. [Repealed, 1949 c 559 s 20]

Subd. 3. [Renumbered 30.59]

Subd. 4. [Renumbered 17.219]

17.30 [Renumbered 30.55]

17.31 [Renumbered 30.56]

17.32 [Renumbered 30.57]

17.33 [Renumbered 30.58]

17.34 [Repealed, Ex1959 c 73 s 1]

MINNESOTA DEPARTMENT OF NATURAL RESOURCES
LAURENTIAN TACONITE MINE - DRAFT EIS
 JULY 16, 1990 - GILBERT, MINNESOTA
DRAFT EIS COMMENT FORM



The Department will prepare a Final EIS for the Laurentian Taconite Mine, based on the comments received on the Draft EIS. We will appreciate receiving your comments on the Draft EIS. You may find it convenient to use this form to submit your written comments.

17A We are the owners of the nearest residence to the proposed Laurentian Taconite Mine. First of all, we would like to know if all project activities are within certain allowable standards as far as distance is concerned. It states in the EAW that the nearest receptors are the residence in Gilbert and McKinley which will be no closer than 1000 ft. from any project activity. In the EIS it states that we are 400 ft. away from the berm, which we feel is project activity.

17B During early stages of berm construction, noise levels as high as 75 dBA is expected and the MPCA standard is 55dBA. We believe at no time any limit should be exceeded, be it noise, air shock or ground vibrations at our residence.

17C We are also very concerned about the noise and dust from the haul road and the consequences if damage is done to the fuel tanks which are less than 100 ft. from our home.

In various paragraphs of the EIS it is stated in phrases such as "are not anticipated", "is not expected to be exceeded", and "are not likely to". Being
 (CONTINUED ON REVERSE SIDE)

Please leave this form with any of the DNR staff at the meeting, or mail it to:

Rebecca A. Wooden, Environmental Planner
 NR Planning and Review Services
 Minnesota DNR
 500 Lafayette Road
 St. Paul, MN 55155-4010

Comments on the Draft EIS must be received by Monday, July 30, 1990 at 4:30 P.M.

(Over)

RESPONSES

3.1.17 Mr. Jacob Bradach and Ms. Michelle Bradach

17A The mineland reclamation regulations (Minnesota Rules Chapter 6130) address both the siting of mining facilities, and the use of buffers to minimize potential impacts caused by the mining activities. In general, the rules require that mining landforms (pits, stockpiles of rock or surface overburden, tailings basins, etc.) not be placed within 500 feet of an occupied dwelling, unless allowed by the owner. However, landforms whose main purpose is to act as buffers or barriers are exceptions to this rule. Such a buffer or barrier must be designed specifically to minimize problems such as noise, dust, and views of mining activities.

In the Final EIS, the Department will respond to timely substantive comments on the draft EIS consistent with the scoping decision. Any person submitting substantive comments on the Draft EIS will receive a copy of the Final EIS, as well as the EIS Adequacy Decision. To receive a copy of these documents, please supply your name and mailing address:

Name: Jacob and Michelle Bradach
Address: 700 North Broadway, P. O. Box 204
City, State, Zip: Gilbert, MN 55741 Tel: (218) 741-0414

Please use additional sheets if you need more space. Thank you for your help.

(CONTINUATION FROM FRONT)

- 17D | the nearest residence, we would expect constant monitoring to be sure noise, air shock and ground vibrations are not exceeded at any time.
- 17E | We were also told at the final EIS comment meeting by Jonathan Holms that a third-party could be brought in to video tape our home before any project activity begins. They could also record the tranquil nights when the crickets and frogs put us to sleep and when we awaken to the sound of chirping birds. Compare that to the noise of the production trucks, shovels, and other mining equipment that we are expected to get accustomed to.
- 17F | We moved to this location at 700 North Broadway in Gilbert nearly 6 years ago to escape the noise and other related matters of Eveleth Taconite Mine activity which was more than 10 times as far from our Eveleth home as the LTM project is to be to our home now. We have invested a lot of money and countless hours of hard work extensively renovating our home. We bought this house because of its location of solitude and privacy and feel we are being unfairly infringed upon by this project and how it can unfavorably affect the value of our house and property.
- 17G | In closing, we believe a fine job was done on the EIS, but the findings are mostly projected results and actual results may be different once this project begins. Being the closest residence, we are concerned about all aspects of this LTM project and how it is going to adversely affect our lives and livelihood.

*Jacob P. Bradach
Michelle Bradach*

RESPONSES, CONT.

Man-made landforms planted with vegetation, such as the sound attenuation berm proposed by Inland Steel, have been used very effectively at a number of locations along the Iron Range. The most notable use of buffers has been by Eveleth Taconite, on the west side of the City of Eveleth.

When the DNR evaluates or recommends the use of buffers and barriers, it tries to ensure that the buffer is as close to the mining activity as possible, so as to be effective. The DNR also tries to ensure that an undisturbed land area that is as large as possible will remain between the buffer and adjacent occupied dwellings. In addition, to minimize impacts caused by the buffer construction itself, the DNR requires that buffers be established as early in the operation as possible, and be completed as quickly as practicable.

Assuming that the sound attenuation berm proposed by Inland Steel is constructed in accordance with the design and scheduling plans that have been proposed, the buffer would be in full compliance with the DNR's mineland reclamation regulations and its philosophy relating to the use of such structures.

- 17B** The DNR acknowledges Jacob and Michelle Bradach's shared view that at no time should any noise standards be exceeded. As indicated in the Draft EIS, noise levels as high as 75 dBA might occur at the Bradach's residence while the sound attenuation berm is being constructed. The daytime (7:00 a.m. to 10:00 pm) L10 noise standard established by the MPCA for residential areas (Minnesota Rules 7010.0040) is 65 dBA. The nighttime (10:00 p.m. to 7:00 a.m.) L10 noise standard for residential areas is 55 dBA. This means that during the day, the 65 dBA level must not be exceeded for more than 10 percent of the time (6 minutes per hour), and that during the night the 55 dBA level must not be exceeded for more than 10 percent of the time (6 minutes per hour). Noise resulting from berm construction could exceed 75 dBA during the day for periods not exceeding 6 minutes per hour, or 55 dBA during the night for periods not exceeding 6 minutes per hour, and would not be in violation of MPCA noise standards.
- 17C** These concerns are acknowledged by the DNR. The Draft EIS is thorough in its assessment of possible noise, dust, and blasting impacts. With publication of the Final EIS, these concerns will be relayed to both the project proposer and to various decision makers for their consideration in regulatory decisions relating to the proposed project.
- 17D** This comment is acknowledged by the DNR. With publication of the Final EIS, Jacob and Michelle Bradach's shared expectation that constant noise, air shock, and ground vibration monitoring will occur will be conveyed to both the project proposer and to various decision makers for their consideration in operational and regulatory decisions relating to the proposed project.
- 17E** The videotape referred to by Mr. Holmes relates to blasting effects. If blasting damage is a major concern to the Bradachs, their foundation, walls, and windows could be videotaped prior to mining activity. This would give definitive proof if damage were to occur. The Bradachs are advised, through publication of the Final EIS, to contact Mr. Holmes if they wish to make such arrangements.
- 17F** These comments and concerns are acknowledged by the DNR. These concerns regarding the possible impacts of the proposed project on the Bradachs' real estate market value will be conveyed, with publication of the Final EIS, to both the project proposer and to decision makers for their consideration in regulatory decisions relating to the proposed project.
- 17G** This comment is noted by the DNR. The Draft EIS is thorough in its discussion of impact monitoring that will be performed by the project proposer. Also, the project proposer's representative stated, in writing, the company's intent to

minimize the effects of its mining operations on local residents by a variety of activities, including construction and reclamation of a sound attenuation berm, changes in blasting procedures, and the use of dust suppressants on haul roads. The company has expressed its commitment to monitoring the impacts of its operation on the environment and the local citizens, and to complying with applicable standards relating to those impacts.

These concerns will be conveyed, with publication of the Final EIS, to both the project proposer and decision makers for their consideration in operational and regulatory decisions relating to the proposed project.

3.2 *Public Meeting Comments and DNR Responses*

This section of the Final EIS includes statements made or questions raised at the July 16, 1990 public information meeting on the Draft EIS, and the responses to those comments by the Department of Natural Resources as the Responsible Governmental Unit. The statements or questions are organized according to general topics, along with statements outlining the nature of the concerns and the DNR's response to the particular comments.

3.2.1 Haul Road Alignment Alternative #3

The following citizens expressed their concerns about Haul Road Alignment Alternative #3 and the resulting noise, dust, and vibration impacts that might affect Gilbert residents: The Honorable Karl Oberstar, Jr., Mayor of Gilbert, Mr. Mark St. Lawrence (representing 31 petitioners), Mr. Tom Juth, Mr. Leo Skrbec, Mr. Ralph Cass, and Mr. Ed Kodunce.

These concerns are similar to those expressed in comment letters 2, 3, 12, and 13 reprinted in Final EIS Section 3.1. Refer to the responses to these comments in sections 3.1.2, 3.1.3, 3.1.12, and 3.1.13. Also refer to Section 3.1.10 for the DNR's response to the U.S. Fish and Wildlife Service comment (10D) indicating that agency's view of Haul Road Alignment Alternative #3.

In addition, Mayor Oberstar indicated that the City of Gilbert would not approve a zoning change required for project implementation so long as Haul Road Alignment Alternative #3 remains under consideration. The DNR notes this comment.

Refer also to Final EIS Section 2.4. This section contains revised Draft EIS Section 6, pages 6-15 to 6-18, which was revised to include additional information pertaining to alternative haul road routes.

3.2.2 Impacts Due to Blasting

Mr. John Primozich, Mr. Frank Omersa, Mr. Leo Skrbeck, Mr. Jack Bradach, and Mr. S.P. Bordeau (representing Mrs. Beatrice Kapeller) requested information and expressed concerns regarding the magnitude of vibration and noise that would occur during blasting.

Information requests were referred to the appropriate section of the Draft EIS. A question on whether residents would have to be evacuated during blasting was responded to by a representative of Inland Steel Mining Company, who indicated that smaller charges could be used to prevent the necessity for evacuation.

The Draft EIS is thorough in its assessment of potential blasting-related noise and shock impacts. Refer also to Final EIS sections 3.1.12 (response to comment 12C) and 3.1.17

(responses to comments 17D and 17E) regarding similar concerns that were expressed in written comments.

These concerns will be conveyed to both the project proposer and various decision makers for their consideration in operational and regulatory decisions relating to the proposed project.

3.2.3 Road Access to the City of McKinley

The Honorable Joe Vaida, Mayor of McKinley, and Mr. Ed Kobe expressed concern that because development of the Laurentian Mine would necessitate physical closure of abandoned Trunk Highway 135, the City would be isolated and railroad activities could block the remaining access to and from the city.

This issue was also raised in written comment letters received from Mayor Vaida and Ms. Mary Cossalter, McKinley City Clerk. Refer to Final EIS Section 3.1.5 for the DNR's response to these comments.

In addition, representatives from Inland Steel and the DM&IR Railroad indicated that the two companies would work together to facilitate medical emergency transportation from the City of McKinley should the existing road access be blocked by railroad activities.

3.2.4 Corsica Pit Stockpile Runoff Diversion Berm

The Honorable Joe Vaida, Mayor of McKinley, expressed his concern that a diversion berm, proposed to protect the Corsica Pit from excessive sedimentation, would be washed out by rainfall. Representatives from the DNR indicated that the proposed berm would be evaluated carefully during permitting.

3.2.5 Dust and Noise Impacts from Stockpiling

The Honorable Joe Vaida, Mayor of McKinley, expressed his concern that the City would be negatively impacted by noise and air pollution from the proposed waste rock and lean ore stockpiles. This concern is similar to that expressed in comment letter 7, submitted by Ms. Mary Cossalter, McKinley City Clerk. Refer to Final EIS Section 3.1.7 for the DNR's response to this concern.

SECTION 4: Final EIS Coordination

This section of the Final Environmental Impact Statement contains copies of particular project coordination correspondence to provide readers and reviewers with additional relevant information on the project proposed by Inland Steel Mining Company. This correspondence consists of the following:

1. Letter from Rebecca Wooden, Minnesota Department of Natural Resources, to Jonathan Holmes, Inland Steel Mining Company, dated August 3, 1990.

This letter summarizes the comments received during the Draft EIS public review and comment period and the DNR's responses to those comments. The letter also identifies the comments requiring responses by Inland Steel.

2. Letter from Jonathan Holmes, Inland Steel Mining Company, to Rebecca Wooden, Minnesota Department of Natural Resources, dated August 14, 1990.

This letter is in response to the DNR's August 3, 1990 letter to Inland Steel (listed above). As requested by the DNR, this letter contains Inland Steel's responses to specific public comments. These responses were incorporated into Section 3 of this Final EIS.



STATE OF
MINNESOTA
DEPARTMENT OF NATURAL RESOURCES



DNR INFORMATION
(612) 296-6157

500 LAFAYETTE ROAD • ST. PAUL, MINNESOTA • 55155-4010

August 3, 1990

Mr. Jonathan H. Holmes
Inland Steel Mining Company
P.O. Box 1 - U.S. 53 North
Virginia, MN 55792

RE: Laurentian Taconite Mine - Draft EIS
Public Review Comments

Dear Jonathan:

The comments submitted to the Department of Natural Resources on the Draft Environmental Impact Statement (EIS) for the proposed Laurentian Taconite Mine have been evaluated. As we have previously discussed, Inland Steel, the project proposer, will need to supply draft responses for some of the comments submitted. This letter outlines the type and extent of responses that are necessary to adequately respond to the issues raised in the comment letters. For your assistance in reviewing the comments, each is assigned a Comment Number. These numbers refer to the order in which the letter will appear in the Final Environmental Impact Statement (EIS). The comment letters and associated Comment Numbers are as follows:

<u>Comment submitted by</u>	<u>Comment Number(s)</u>
Mayor Karl Oberstar, Jr. City of Gilbert	1A to 1B
Mr. Mark St. Lawrence, representing 31 individuals and families signing a petition addressed to the DNR	2A to 2E
Mr. Mark St. Lawrence, representing 405 individuals and families signing a petition addressed to the DNR	3A to 3C
Ms. Debra L. McGovern, Minnesota Pollution Control Agency	4A to 4L
Mayor Joseph Vaida and Ms. Mary Cossalter City of McKinley	5A to 5C
Ms. Mary Cossalter City of McKinley	6A
Ms. Mary Cossalter City of McKinley	7A
Ms. Mary Cossalter City of McKinley	8A
Ms. Mary Cossalter City of McKinley	9A
Mr. James L. Smith, U.S. Fish and Wildlife Service	10A to 10N
Mr. James F. Walsh, Minnesota Department of Health	11A to 11B

Mr. Karl Oberstar, Jr., Mayor	12A to 12D
Mr. Dennis Sandstrom, Councillor	
Mr. Herbert Clapsaddle, Councillor	
Mr. Marco Biondich, Councillor	
Mr. Joseph Gentile, Councillor	
City of Gilbert	
Mr. Thomas J. Juth	13A
Mrs. Sandra Wiermaa	14A to 14B
Ms. Rosemary Norhu	15A to 15D
Ms. Rosemary Norhu	16
Mr. Jacob Bradach and Ms. Michelle Bradach	17A to 17G

In order to facilitate timely preparation of the Final EIS, please submit these responses to the DNR by August 7, 1990. The Department will review the sufficiency of the draft responses and inform you whether additional information is required or whether those responses are sufficient. At that time, I will also notify you of the time schedule for Final EIS preparation. Please contact me if you would like to discuss the items identified in this letter.

Sincerely,


Rebecca A. Wooden, Environmental Planner
Natural Resources Planning and Review Services
Office of Planning
(612)297-3355

Attachment

c: EIS Staff Review Team
Frank Svoboda, Barr Engineering

900041-02

PROPOSED LAURENTIAN TACONITE MINE
FINAL ENVIRONMENTAL IMPACT STATEMENT PREPARATION
DISCUSSION OF COMMENTS RECEIVED
AND PROPOSER'S DRAFT RESPONSE

COMMENT 1A

The Honorable Karl Oberstar, Jr., Mayor of the City of Gilbert, expresses his concern that Inland Steel, the DNR, and the PCA do everything possible to protect the City from unsafe or disruptive living conditions due to the proposed project. In the Final EIS we will indicate that we have noted the comment, and that comments related to permitting will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in decisions relating to the proposed project. No further response from Inland Steel is required for this comment.

COMMENT 1B

Mayor Oberstar indicates his support of the project insofar as the majority of citizen concerns are met. Comments related to the merits of the proposed project, or to future permitting requirements, will be, with the publication of the Final EIS, provided to various decision makers for their consideration in regulatory decisions under their control. No further response from Inland Steel is required for this comment.

COMMENT 2A

Mr. Mark St. Lawrence (representing 31 petitioners) references the Draft EIS, which he states indicates that mining activity will not occur closer than 1000 feet from the nearest residence. Mr. St. Lawrence also points out that the proposed Alternative #3 haul road route comes to within 250 feet from occupied dwellings. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 2B

Mr. St. Lawrence identifies noise impacts that would be associated with construction of Haul Road Alternative #3, and the impossibility of constructing a sound attenuation berm at this location for noise reduction purposes. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 2C

Mr. St. Lawrence indicates that northwest winds predominate in the project area, and that this condition would aggravate air quality impacts associated with Haul Road Alternative #3. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 2D

Mr. St. Lawrence expresses his concern that factors in addition to preservation of wetland areas (specifically, adverse effects on property, safety, and human health) be considered when selecting a haul road alignment. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 2E

Mr. St. Lawrence expresses his view that the DNR will concur that construction of Haul Road Alignment #3 would be severely detrimental to the quality of life in Gilbert and that it should be eliminated from any further consideration. The DNR will respond that the Responsible Governmental Unit (RGU) does not select an alternative as a component

of the Environmental Review Process. We will also indicate that comments relating to the permitting process will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 3A

Mr. Mark St. Lawrence (representing some 400 petitioners) expresses support for the petition containing comments 2A to 2E, listed above. The response will indicate that the DNR recognizes the petition as an expression of support for the previously mentioned petition. No further response from Inland Steel is necessary.

COMMENT 3B

Mr. St. Lawrence reiterates concerns about air quality. The DNR's response to comment 2C will suffice as response to this comment. No further response from Inland Steel is necessary.

COMMENT 3C

Mr. St. Lawrence indicates that Haul Road Alignment #3 is unacceptable to the citizens of Gilbert. In the Final EIS, the DNR will reiterate the position that the Responsible Governmental Unit (RGU) does not select an alternative as a component of the Environmental Review Process. We will also indicate that comments relating to the permitting process will be conveyed with the publication of the Final EIS to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 4A

The Minnesota Pollution Control Agency (MPCA) restated (as noted in their comment letter during scoping) their concern that the abandoned Elcor townsite might contain an open dump, buried filling station, or domestic fuel tanks. The MPCA indicates that its staff should be consulted about the proper means of closure and disposal. The MPCA has also verbally advised us that Inland Steel would be held responsible should any such dumps or tanks leak, even if they are buried by waste rock or overburden stockpiles. Inland Steel has indicated (by letter, October 4, 1989) that a field investigation showed no evidence of a townsite dump. However, Inland Steel needs to respond to this comment, documenting its intention to consult with MPCA staff regarding this matter. We will then so indicate in the Final EIS.

COMMENT 4B

The MPCA indicates that a permit may be required for tanks located at the proposed truck repair shop. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 4C

The MPCA states that a more thorough evaluation of transportation alternatives might have been appropriate. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 4D

The MPCA refers to P. 4-18, paragraph 1 of the EIS, and comments that inflow is likely still occurring and will continue to occur. The DNR has asked Barr Engineering to prepare a response to this comment. No further response from Inland Steel is necessary.

COMMENT 4E

The MPCA indicates that abandoned mine pits are considered waters of the state, and are thus protected under MPCA water quality rules. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 4F

The MPCA has pointed out a discrepancy in bar graph data included in the Draft EIS. The DNR has asked Barr Engineering to prepare a response to this comment. No further response from Inland Steel is necessary.

COMMENT 4G

The MPCA has requested information regarding the estimated time required for mine and ground water levels to stabilize. John Adams of the DNR will prepare a response to this comment, no further response from Inland Steel is necessary.

COMMENT 4H

The MPCA notes that figure 5-8 may indicate that ground water levels in the vicinity of Lake Orebegone and the Mariska pit/lake may not have stabilized. The DNR has asked Barr Engineering to prepare a response to this comment. No further response from Inland Steel is necessary.

COMMENT 4I

The MPCA strongly advises the use of short-term watershed Best Management Practices (BMP's) listed on page 6-6 of the Draft EIS. The MPCA excepts wetland treatment (mentioned on page 6-7) from this recommendation. In the Final EIS we will indicate that we have noted the comment, and that comments relating to the permitting process will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 4J

The MPCA indicates that use of wetlands as treatment systems must be approved and permitted by the MPCA, and that this permitting is unlikely. Constructed wetlands should be used if wetland treatment is indicated. In the Final EIS we will indicate that we have noted the comment, and that comments relating to the permitting process will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 4K

The MPCA indicates that abandoned mine pits should be referred to as "lakes", indicating their status as waters of the state. John Adams, of the DNR will prepare a response to this comment, no further response from Inland Steel is necessary.

COMMENT 4L

The MPCA expresses its view that the task force approach taken in EIS preparation has worked well, and expressed appreciation for the manner in which Inland Steel personnel approached the task. In the Final EIS, we will note these comments, and convey them to you via Final EIS publication. No further response from Inland Steel is necessary.

COMMENT 5A

The Honorable Joseph Vaida, Mayor, and Mary Cossalter, City Clerk, submitted comments on behalf of the City of McKinley. The City expresses its opposition to the proposed project as it affects former Trunk Highway 135. In the Final EIS we will

indicate that we have noted the comment, and that comments relating to the merits of the proposed project will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 5B

Mayor Vaida and Ms. Cossalter expressed the City's view that it has a right of reasonable access to other cities on Highway 135, that CSAH #20 does not provide reliable access due to two railroad crossings, and that old Trunk Highway 135 is the primary access route in and out of the city. The DNR will respond to this comment, however, as there is a meeting upcoming in McKinley to discuss the issue, you may be providing information regarding the highway closure, blockage of the railroad crossing, or Inland's willingness to provide emergency access through the mine area. It would be our preference to have this information available for inclusion in the Final EIS.

COMMENT 5C

Mayor Vaida and Ms. Cossalter indicated the City's view that it is incumbent on the State of Minnesota and the Department to provide reasonable and reliable access from McKinley to communities to the west. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 6A

Ms. Mary Cossalter, City Clerk, submitted comments on behalf of the City of McKinley, objecting to possible lowering of water levels in the Corsica Pit, the city's drinking water supply. John Adams of the DNR will prepare a response to this comment, no further response from Inland Steel is necessary.

COMMENT 7A

Ms. Mary Cossalter, City Clerk, submitted comments on behalf of the City of McKinley, expressing her view that the proposed stockpile area is too close to McKinley homes, and that it would contribute to extensive dust and noise pollution. Bill Lynott of the MPCA, and Paul Pojar of the DNR will prepare a response to this comment, no further response from Inland Steel is necessary.

COMMENT 8A

Ms. Mary Cossalter, City Clerk, submitted comments on behalf of the City of McKinley objecting to the closing of Old Highway 135. The DNR's response to Comment 5A, including any information provided by Inland Steel should suffice as response to this comment. No further response from Inland Steel is necessary.

COMMENT 9A

Ms. Mary Cossalter, City Clerk, submitted a letter from the City Engineer, with diagrams, indicating possible impacts to McKinley's municipal water intake system from the proposed project. The response to Comment 6A should suffice as response to this comment, no further response from Inland Steel is necessary.

COMMENT 10A

The U.S. Fish and Wildlife Service notes that the proposer has found railroad and conveyor belt ore transportation methods unacceptable due to large initial capital investment costs. The DNR will acknowledge this comment with no further response necessary. However, if this comment is not accurate, Inland Steel should provide a response.

COMMENT 10B

The U.S. Fish and Wildlife Service indicates that alternatives to the proposed haul road alignments were held to be either unacceptable or undesirable by the proposer. It is my understanding that this is not the case, that the company has always been open to alternative haul road alignments. Inland needs to respond to this comment.

COMMENT 10C

The U.S. Fish and Wildlife Service indicates that the proposed haul road alignment will severely impact the Pike River Valley environment. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 10D

The U.S. Fish and Wildlife Service describes Alternative Haul Road Alignment #3, and states its view that the route would reduce impacts to undisturbed lands and wetlands. The Service also indicates that the route is held by Inland Steel to not be cost effective, and is thus unacceptable to Inland Steel. The Department will prepare a response to this comment relating to the impacts of this route on the city of Gilbert, and also the non-compliance with Mineland Reclamation Rules. However, Inland should probably prepare a response regarding the cost effectiveness or engineering feasibility of the route.

COMMENT 10E

The U.S. Fish and Wildlife Service indicates that staff would object to the proposed route's Pike River crossing, that is, a crossing of wetland on fill with a single 72-inch diameter corrugated metal pipe provided for flow; and that the Service usually recommends bridge work and piles in such situations. In the Final EIS we will indicate that we have noted the comment, and that comments relating to the permitting process will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 10F

This comment is a partial restatement of Comment 10A, the response to which should suffice as response to this comment. No further response from Inland Steel is necessary.

COMMENT 10G

The U.S. Fish and Wildlife Service includes their analysis of the economic feasibility of a rail haul alternative. The DNR's response to this comment is that an analysis of a rail haul alternative is beyond the scope of this EIS. Inland Steel may wish to provide further economic information regarding a rail haul alternative, which we would include in a revised Appendix B.

COMMENT 10H

The U.S. Fish and Wildlife Service indicates that Inland Steel is reportedly going to proceed with a conveyor system shortly after operations begin. The DNR will respond that analysis of a conveyor system is beyond the scope of this EIS. However, Inland Steel should provide a statement of the likelihood that a conveyor system will be constructed, and what the timeline would be for such a development.

COMMENT 10I

The U.S. Fish and Wildlife Services indicates that wetlands located in the stockpile area are of medium to high quality for fish and wildlife resources, and are worth protection from impacts. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 10J

The U.S. Fish and Wildlife Service indicates that all wetlands in the stockpile area, including a minimum 250-foot wide buffer zone, should be avoided. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 10K

The U.S. Fish and Wildlife Service indicates that the wetlands in the stockpile area play an important role in the health and stability of the headwaters of the Pike River. John Adams of the DNR will prepare a response to this comment, no further response from Inland Steel is necessary.

COMMENT 10L

The U.S. Fish and Wildlife Service indicates that were a railroad established as the preferred alternative, it could be used to haul waste rock and overburden to be dumped into the mine pits on U.S. Steel property. In the Final EIS the DNR will reiterate that 1) a railroad transportation alternative is beyond the scope of the EIS; and 2) that the Responsible Governmental Unit (RGU) does not select an alternative as a component of the Environmental Review Process. For the record, Inland Steel should prepare a brief response addressing the feasibility of hauling waste rock to be dumped in previously mined areas.

COMMENT 10M

The U.S. Fish and Wildlife Service indicates that the proposed project will not affect the bald eagle or peregrine falcon. The DNR will note these comments, no further response from Inland Steel is necessary.

COMMENT 10N

The U.S. Fish and Wildlife Service states that the EIS should address in greater specificity mitigation of impacts to the gray wolf. The DNR will prepare a response reflecting provisions in the Permit to Mine for haul road closure. Inland Steel should provide a response indicating that the haul road will be open to neither public nor employee use during the life of the mine; and that the road will be used for ore and mining vehicle transport only.

COMMENT 11A

The Minnesota Department of Health submitted comments indicating that dewatering wells greater than 25 feet in depth must be constructed by a licensed well contractor or dewatering well contractor and that permits would be required for the construction of dewatering wells greater than 45 feet in depth. Inland Steel should provide a response to this comment, indicating 1) whether any such dewatering wells are contemplated, and 2) that the company will comply with all applicable statutes.

COMMENT 11B

The Department of Health comments that exploratory borings must comply to Minnesota Rules, Chapter 4727. The DNR will note these comments and indicate that through publication of the Final EIS, they will be conveyed to the project proposer. No further response from Inland Steel is necessary.

COMMENT 12A

Mayor Karl Oberstar, Jr., and Councillors Dennis Sandstrom, Herbert Clapsaddle, Marco Biondich, and Joseph Gentile, representing the Gilbert City Council expressed an absence of objections to the proposed project provided that all permitting agencies eliminate Alternative Haul Road #3 from further consideration. The Council also expressed their support for the original proposed haul road alignment. The DNR will

indicate that the Responsible Governmental Unit (RGU) does not select an alternative as a component of the Environmental Review Process, and that comments relating to the permitting process will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 12B

The Gilbert City Council expressed concern regarding noise and dust impacts, fluctuations in Lake Orebegone water levels, and impacts to the City's Wastewater Treatment Plant. The DNR will respond that the Draft EIS is thorough in its assessment of these impacts. No further response from Inland Steel is necessary.

COMMENT 12C

The Gilbert City Council requested assurances that noise, water and air quality, and blasting effects will be closely monitored. Bill Lynott of the MPCA will prepare a response indicating Inland's obligations under the terms of its permits for Minorca. Inland Steel should prepare a response indicating its commitment to monitoring, and to restitution should damages occur.

COMMENT 12D

The Gilbert City Council requests that all agencies work to protect the City from detrimental effects caused by the proposed project. In the Final EIS we will indicate that we have noted the comment, and that comments relating to the permitting process will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 13A

Mr. Thomas Juth indicated his opposition to Alternative Haul Road #3, due to the increased noise and dust impacts to residents of Gilbert that would result. The responses to Comments 2A to 2E should suffice in responding to this comment. No further response from Inland Steel is necessary.

COMMENT 14A

Mrs. Sandra Wiermaa expresses her view that private citizens are subject to greater restrictions than mining companies with respect to shoreland ordinances. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 14B

Mrs. Wiermaa expresses her concern that run off from waste rock, stockpiles, and the haul road will contain sulfides and metals that will contaminate the Pike River and Lake Vermilion. The DNR will respond to this comment. It is my intention to use the Hanna laboratory results you supplied us, as well as to reference page 4-38 of the Draft EIS. If the assay data are confidential, please let me know. No further response from Inland Steel is necessary.

COMMENT 15A

Ms. Rosemary Norha references page 4-85 of the Draft EIS, which indicates that a complete biological survey of the project area has not been completed. Ms. Norha also comments that there is an area near the proposed pit that supports many wildflower species, and provides a list of species she has observed. In the Final EIS, the DNR will note this comment, and reiterate that the area provides habitat appropriate to only two listed species, of which there are no reported occurrences. No further response from Inland Steel is necessary.

COMMENT 15B

Ms. Norha also states that Jonathan Holmes of Inland Steel has indicated that due to technical considerations this area may not be disturbed. Inland Steel should respond to this comment, and indicate, if possible, the likelihood that the area will remain undisturbed by mining.

COMMENT 15C

Ms. Norha expresses her belief that varieties of the lily and orchid families are protected by law, referencing Minnesota Statutes Section 17.23. The DNR will respond to this comment. No further response from Inland Steel is necessary.

COMMENT 16A

In an additional comment letter, Ms. Norha expresses her view that Inland Steel Mining company would be in violation of Minnesota Statutes Section 17.23 if the Laurentian Mine is developed as proposed. The DNR's response to Comment 15C will suffice as response to this comment. No further response from Inland Steel is necessary.

COMMENT 16B

Ms. Norha provides additional description of natural resources-related amenities located in the proposed project area. The DNR will note these comments and indicate that the Draft EIS is thorough in its assessment of environmental impacts. No further response from Inland Steel is necessary.

COMMENT 16C

Ms. Norha indicates that the DNR should take action to prevent Inland Steel from disturbing the wildflowers; and suggests that a "natural reserve" be established to save the flowers. The DNR will respond to these comments. No further response from Inland Steel is necessary.

COMMENT 17A

Jacob and Michelle Bradach question whether the proposed sound attenuation berm, which will be 400 feet from their residence, constitutes mining project activity. If so, this would conflict with statements in the Draft EIS that mining activity will not occur closer than 1000 feet from any residence. The DNR will respond to this comment, no further response from Inland Steel is necessary.

COMMENT 17B

Jacob and Michelle Bradach express their view that at no time should any noise levels be exceeded. They reference the Draft EIS which indicates that noise levels as high as 75 dBA could be expected during early stages of berm construction, although the MPCA standard is 55 dBA. Bill Lynott of the MPCA will prepare a response to this comment. No further response from Inland Steel is necessary.

COMMENT 17C

Jacob and Michelle Bradach express concern about noise, dust, and damage to fuel tanks near their residence. In the Final EIS we will indicate that the Draft EIS is thorough in its assessment of possible noise, dust and blasting impacts, and that with the publication of the Final EIS, these concerns will be relayed to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 17D

Jacob and Michelle Bradach state their expectation that constant monitoring will take place to ensure that noise, air shock and ground vibrations do not exceed allowable levels at any time. In the Final EIS we will indicate that we have noted the comment, and that comments related to permitting will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 17E

Jacob and Michelle Bradach indicate that Jonathan Holmes of Inland Steel Mining Company told them that a video-taping of their home could be arranged. Inland Steel should respond to this comment, explaining more specifically Mr. Holmes' remarks.

COMMENT 17F

Jacob and Michelle Bradach state their view that the value of their house and property will be adversely affected by the proposed project. The DNR will note these concerns and convey them, with the publication of the Final EIS, to the project proposer and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is necessary.

COMMENT 17G

Jacob and Michelle Bradach state their view that the Draft EIS was well-prepared, and also express their concern that projected results may not be accurate after the project commences. In the Final EIS we will indicate that we have noted the comment, and that comments relating to the permitting process will be conveyed, with the publication of the Final EIS, to both the project proposer, and to decision makers for their consideration in regulatory decisions relating to the proposed project. No further response from Inland Steel is required, although it might be appropriate (and comforting to these people) for the company to give some assurances about their commitment to monitoring and reparations, if needed.

COMMENTS RECEIVED AT THE PUBLIC MEETING

A number of concerns were raised at the public information meeting held July 16, 1990, in Gilbert. We will respond to these by referencing previous responses to comment letters; or by rewording the answers that were given at the public meeting.

CONCERN: Mr. Tom Juth requested information on surveys completed on prevailing winds in the area of the proposed haul road and stockpile, and information on proposed sound attenuation berm height relative to the height of the proposed haul road. Mr. Juth's questions were related to the possible impacts of noise and dust from the proposed mining activities, specifically with respect to proposed Haul Road Alignment 3.

CONCERN: Mr. John Primozich expressed concerns that residents might experience property damage (specifically glass breakage) at decibel levels lower those published by the U.S. Bureau of Mines; and also requested information regarding dust suppression on the proposed haul road.

CONCERN: Concerns were expressed by many citizens that Alternative Haul Road Route 3 was too close to residences, and that the dust and noise from the proposed route would be both an extreme annoyance as well as health hazard to Gilbert citizens.

Mr. Mark St. Lawrence read and presented a petition to the Department stating citizen concerns about proximity to existing neighborhoods, noise, and air quality. Citizens also presented a map showing the location of residences relative to the proposed alignment.

CONCERN: Mr. S.P. Bordeau, representing Mrs. Beatrice Kapeller, requested information regarding the magnitude of vibration and noise that will occur during blasting.

CONCERN: Mr. Frank Omersa requested information regarding the proximity of blasting to residences, and expressed concerns that residents would have to be evacuated.

CONCERN: Mr. Leo Skrbec requested information regarding expected noise levels during blasting, and expressed his concerns regarding proposed Alternative Haul Road Route 3. Mr. Skrbec also indicated his feeling that wetlands concerns were being afforded a higher priority than consideration for people.

CONCERN: The Honorable Joe Vaida, Mayor of McKinley, expressed concerns that the City would be isolated, and that ingress and egress could frequently be blocked by railroad activities, if citizen use of old Highway 135 is prohibited by mining activities.

CONCERN: Mayor Vaida also expressed his concerns that the diversion berm proposed to protect the Corsica Pit (McKinley's water supply) from sedimentation would be washed out.

CONCERN: Mayor Vaida also expressed his concerns that the City of McKinley would be negatively impacted by noise and air pollution from the proposed waste rock and lean ore stockpiles.

CONCERN: The Honorable Karl Oberstar, Mayor of Gilbert expressed the City's concerns about noise and dust from proposed Haul Road Alignment 3, and indicated that he would ask the City Council to deny Inland Steel's request for a zoning change to permit mining, until such time as Alignment 3 was removed from further consideration.

CONCERN: Mr. Ed Kobe expressed his concerns that a train wreck could block emergency access to the City of McKinley.

CONCERN: Mr. Jack Bradach indicated that he owns the residence closest to the proposed mine, and expressed his concerns about noise from the proposed shop building, blasting, and other mine activities. Mr. Bradach also requested information regarding procedures should his property be damaged.

CONCERN: Mr. Ed Kodunce expressed his opinion that Haul Route 3 would impact wetlands to the same extent as the other presented alignments.

Inland Steel Mining Company
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Virginia, Minnesota 55792
218 749-5910



Inland Steel Mining

August 14, 1990

Ms. Rebecca Wooden
Environmental Planner
Minnesota Department of
Natural Resources
500 Lafayette Road
St. Paul, Minnesota 55146

Dear Rebecca:

Subject: Responses to Draft EIS Comments

The following are the responses you requested to comments on the draft Environmental Impact Statement for the Laurentian Project:

- 4A. Prior to stockpiling on the old Elcor townsite, Inland will conduct another field investigation to determine if an abandoned open dump exists. Inland will also try to determine through the Iron Range Historical Society if any buried fuel oil tanks exist on the property. If such items are discovered, the MPCA staff will be consulted about the proper means of closure and disposal.
- 10A. The railroad alternative has never been held to be economically feasible over the life of the project, either from a capital investment viewpoint or an operating cost viewpoint.
- 10B. Inland Steel has always been open to alternative haul road alignments. However, issues of economics and land ownership have to be taken into account when selecting an alternative.
- 10D. The Alternative #3 haul route crosses several properties that Inland Steel does not own. Part of that route runs through an area owned by the East Mesaba Sanitary Disposal Authority. Since that area is being used for sludge disposal for various sewage treatment plants in the area, they will not grant an easement for a haul road to cross that property.

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- 10G. A detailed study of the railroad alternative was completed in 1988. Inland Steel requested a proposal from the DM&IR Railroad for the operating cost, equipment requirement, grade layout, and operating schedules for a railroad between the Laurentian Mine and the Minorca Taconite Plant. Although the existing rail line comes to within two miles of the Minorca Plant, an additional five miles would have to be constructed due to the elevation changes encountered. The operating cost increase using rail instead of a truck haul is approximately \$3.00 per ton of pellets, or \$7.5 million per year at the plant's current capacity of 2.5 million tons. It is obvious from the comment at the top of page 3 that this fact was totally misinterpreted by the USFWS. It would be very poor judgment for Inland Steel to choose a haulage method that cost \$10 million more to install, \$7.5 million more per year to operate, and that would also have to traverse land not owned by Inland Steel. Rail haulage would make the entire Laurentian Project economically unfeasible.
- 10H. Installation of a conveyor is not economically feasible at the present time due to the high capital cost. Inland has no definite plans to install a conveyor in the future. The earliest time a conveyor could even be considered is 1995-2000. Whether such a high cost capital expenditure would take place is dependent on the availability of capital, the payback on reduced haulage cost, and the state of the economy. Inland Steel may never put in a conveyor system. However, it would be desirable to align the proposed haul road along a route acceptable for a conveyor system to reduce the future costs and impacts of such a system.
- 10L. Dumping of waste materials into abandoned mine pits using rail haulage is impractical for a variety of reasons. First, the abandoned pits near the city of Virginia provide the water supply for the city. Contamination and destruction of that supply is not in the public interest. Second, several of those pits surround the East Rouchleau Taconite Reserve. Filling of those pits would render that reserve uninhabitable.

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Third, the surface and mineral rights of the abandoned pits belong to various land and fee holders. Inland Steel owns no interest of any sort in those areas. Fourth, building railroad tracks next to the abandoned pits in order to dump waste materials into them would not be safe or practical. Five, the waste material would have to be double or even triple handled, requiring loaders and trucks on either end of the rail operation. The contention by the USFWS that this would cause "a relatively minor increase in handling and storage costs" is totally unsubstantiated.

- 10N. The proposed haul road would not provide enhanced human access into existing wolf habitat. The area is already crossed by several logging roads that are open to the public. As the Pike River Valley is logged off (the land is privately owned), more roads will be constructed.

The proposed haul road will be closed to public access. This includes access to employees. Only mining traffic will be allowed during the life of the operation.

- 11A. Inland Steel does not anticipate the construction of dewatering wells at this time. If such wells become necessary in the future, Inland Steel will comply with all applicable statutes.

- 12C. Inland Steel is committed to monitoring environmental impacts as required by various permits. If damage occurs to public or private structures from blasting at the Laurentian Mine, Inland is responsible for restitution.

- 15B. Part of the area Ms. Norha refers to is located near some water-filled subsidence areas caused by collapsed underground workings. These areas are located just outside the proposed pit boundaries and would not be disturbed by mining or stockpiling. Without knowing in detail the other locations Ms. Norha refers to, it is not possible to make a determination whether or not they would be disturbed by mining operation.

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- 17E. The videotaping referred to by Mr. Holmes was in relation to blasting effects. If blasting damage is a major concern to the Bradachs', their foundation, walls, and windows could be videotaped prior to mining activity. This would give definitive proof if damage did occur.
- 17G. Inland Steel intends to minimize the effects of its mining operations on local inhabitants by a variety of activities including construction and reclamation of a sound attenuation berm, changes in blasting procedures, and the use of dust suppressants on haul roads. Inland is committed to monitoring the impacts of its operation on the environment and the local people and to staying within applicable government standards related to those impacts.

Sincerely,



Jonathan H. Holmes
Project Manager

JHH:djs

