Laurentian Taconite Mine

FINAL ENVIRONMENTAL IMPACT STATEMENT

MINNESOTA DEPARTMENT OF NATURAL RESOURCES

AUGUST 1990
DATE: September 20, 1990
TO: Final EIS Distribution List Parties
Other Interested Parties
FROM: Thomas W. Balcom, Supervisor 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

ISMCT/Arodemo
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)

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.
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.

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.

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.

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.

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.

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.

The purpose of the Draft EIS. This topic is addressed on page 1-1 of the Draft EIS.

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.

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.

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.

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.

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.


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 ___/3_____th 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
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Proposer
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Proposer's Contact Person
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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.

Karen L. Bowen
Assistant Commissioner for Planning and Special Services
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## COVER SHEET

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

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

Percent of Time Lake Level Exceeded
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

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<th>Alt. #2</th>
<th>Alt. #3</th>
<th>Alt. #4</th>
<th>Alt. #4A</th>
<th>Alt. #4B*</th>
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<td>6.0</td>
<td>4.5</td>
<td>5.0</td>
<td>5.5</td>
<td>3.0</td>
<td>21.0</td>
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<td>Land Ownership Difficulties</td>
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<td>No</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
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<td>Distance Increase (in feet)</td>
<td>0</td>
<td>700</td>
<td>700</td>
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* Not analyzed in detail due to acreage of wetlands impacted  
** Based on wetlands delineated on National Wetland Inventory Maps (see Figure 4.20)
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.
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.
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:

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 155-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.

   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:

Page 3-4
3) Air Quality

On page S-5 it also states that truck traffic on the haul road is expected to be the main cause of dust.

A look at figure 4-18 shows that winds in our area are predominantly from the northwest. Couple that with our residential area lying immediately south of the Alternative #3 haul road and we believe that our air quality will be greatly endangered.

It is our understanding that the Alternative #3 haul road is being considered in the hopes of preserving undisturbed wetlands. While we can appreciate your concern, we strongly urge that not only the preservation of wetland areas be taken into consideration when selecting the Laurentian Mine haul road, but also the adverse effects on the property, safety and health of the families living in the immediate area.

After reviewing all factors, we believe you will agree with us in concluding that the Alternative #3 haul road would be severely detrimental to our quality of life and should therefore be eliminated from any further consideration.

Thanking you in advance for your understanding and cooperation.

Respectfully yours,

Mark & Roberta St. Lawrence & Family
Donald & Constance Selland & Family
Clarence & Alice Johnson & Family
Richard Melar & Family
Gloria Selland & Family
Mr. & Mrs. Mike Mentlo
Bruce & Marilyn Larsen & Family
Gordon Dones & Family
Robert & Beverley Law & Family
Steve & Linda Feng & Family
Richard & Vicki Mader

RESPONSES, CONT.

1. Within 500 feet of any occupied dwelling, unless allowed by the owner

2. Within 100 feet of the outside right-of-way line of any public roadway, except where mine access or haul roads cross such right-of-way line

NOTE: for the purposes of these rules, "mining" includes the process of removing, stockpiling, processing, storing, transporting (excluding the use of common carriers and public transportation systems), and reclaiming any material in connection with the commercial production of metallic minerals. Haul Road Alignment Alternative #3 would not comply with these rules unless a variance were approved.
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:

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.

The air quality issue regarding dust from the haul road is not only a neighborhood concern but a problem that affects our entire city.

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.

Page 3-8
Re: Laurentian Mine E.I.S.  7/24/90

Rebecca,

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

Thank you.

Mark St.-Lawrence
Gilbert, MN.
Mary B. Johnston 221 N. Broadway Gilbert
Ray E. Johnston 112 Michigan Ave. Gilbert

Mary A. Snyder 413 Dakota Ave. W. Gilbert
Judy Atkinson 115 W. Mckenna Ave. Gilbert
Denise Ackerman 202 C. Minn. Ave. W. Gilbert
Bill Babcock Nevada St. Broadway W. Gilbert

Gus Kulik 213 W. Ave. W. Gilbert
Lars Jonish 209 W. Broadway W. Gilbert

John & Betty Brinkmiller 110 N. Broadway W. Gilbert
Gayle Brinkmiller Summit St. W. Gilbert
Shelley Brinkmiller Summit St. W. Gilbert

Paul & Nancy 912 N. Ave. E. W. Gilbert
Joseph Stumpk 700 1/2 N. Broadway W. Gilbert

Pauline 115 W. Michigan Ave. W. Gilbert
Angela Milanovich 115 Indiana Ave. W. Gilbert

Brian 2232 N. Broadway W. Gilbert
Mary A. White 311 N. Broadway W. Gilbert

Betty Jean Stumpk 115 W. Michigan Ave. W. Gilbert
<table>
<thead>
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<th>Address</th>
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<tr>
<td>Mary Stoel</td>
<td>218 Theodore Ave, Gilber</td>
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<td>cemetery</td>
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<td>Paul Johnson</td>
<td>11010 W 14th St, T</td>
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Eveline Cooper
Kitty Curtis
Pete Begich
Carmen Cardile
Earl Grantham
Violet Book
Maynard Rubia
Phyllis Trulson
Ira Funk
Joe Hoke
Margaret Pike
Virginia Cardile
Termines Bloomquist
Mrs. M. J. Lee & Victorine St. John
Peggy Gueke
John Dechar
James Sottrum
Marie Cohn
Bruno Kuter
123 Indiana Ave.

Address
609 S. Broadway
Gilbert, Min.

119 1st Ave. Gilbert
218 Arizona Ave.

100 S. Washington
119 1st Ave. Gilbert
108 S. Washington
105 Nebraska Ave. Gilbert

309 S. Broadway

113 Minnesota Ave.

202 W. Main Ave.
116 W. Main Ave.
106 Pleasant View Court
614 S. Broadway.

115 Lee Ave. W.
160 N. 14th St.

123 Nebraska
107 Louisiana Ave.

My 104th Cuban
316 W. 75th St.

Eddie Melnick
205 W. Main Ave. Gilbert

Irene Melnick
217 N. Broadway Gilbert

Francisco Sanchez
105 Nebraska Ave. Gilbert

(Owner's Name)
219 Nebraska Ave.
Name

Jane Sample
John Smith
Mrs. Robinson
Mary Peterson
Alice Brown
Emily Johnson

Address
105 W. 7th Ave
210 Broadway
120 Michigan Ave
108 Davis Ave
103 Dakota Ave
105 Washington Ave
104 E. 3rd St

311 W. Louis Ave
420 Mich. Ave
120 Mississippi Ave
420 Park

314 Main Ave
115 W. New Jersey

113 W. New Jersey
306 N. Broadway

Louis Bunce, 305 N. Broadway
205 Broadway South

Mary Ann Jackson

Lester Johnson
George Anderson

314 W. Ohio
Mr. Schuble 520 Summit Gilbert

T. Mills

Jan Moglein 107 Iowa 472

Don Edgmon 112 Florida Ave W

Mona Zien 305 Nevada Gilbert

Evel Wilson 119 South Ave. Gilbert

Mary Ann Santelmen 502 S. Lincoln Gilbert

Max Berg

Mrs. John D. Shulin 16 Iowa Ave Gilbert

J. B. Wilson

Summit View Estates Gilbert

Vern Vakhtish 119 New York Ave. Gilbert

Anthony Kramer 114 Jefferson 107

Rose Wenzlick 107 New Jersey Ave.

Eddie Lamon 119 New York Ave. Gilbert

Donny Mann

Harley Johnson

Lynn Sackett

Edward Lengfor

Kim Casasco

Paule Hall

Verri J. Santelmen

Audra S. Gilbert

119 New York Ave. Gilbert

420 S. Broadway Gilbert

103 2/3 New York Ave. Hill

105 Nebraska Ave. U. Gilbert

305 N. Broadway Gilbert

Signed

A. Milt. 1948
William Allwood 124 E 2nd St N E.  Gilbert, IA
Gene A hopp 118 S Broadway, Gilbert, IA
Robert & Betty Do 319 Dakota Ave Gilbert
Pat. Bent 319 Dakota Ave Gilbert
Mike Roda 312 S Broadway Gilbert
Jerry Stavness 114 Sondra Ave Gilbert
Olivia Carney 112 Julian Ave Gilbert
Janet Zeroni Gilbert
Betty De Lawrence Gilbert
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<td>Gilbert 5525</td>
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<td>S. Michael</td>
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<td>Jerry Lake</td>
<td>301 Main Ave.</td>
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<td>Mary Kay Smith</td>
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NAME
Robert Kast
Wanda Jennings
Claudia Allwood
James Justner
Alexy Ribeau
Scott Blasi
Joni Will
Ed Kote
Patti Hill
Daniel Tukanen
Mandy Hill
Amy Hill
Sara Collins
Ernie Jerome
Robert Thomas
Michael Os
daniel Lee
John Bute
Kim M. Veach

ADDRESS
118 N. Main St. - Gilbert
113 Golf Ave - Gilbert
104 N. Ave, Gilbert
112 Mich Ave & Gilbert

on Wisconsin St. -
1776 Central Gilbert
Gilbert, MN

Sports
Gilbert, MN
McKeen
Gilbert
Gilbert
NAME
Carol Johnson
John Mayer
Jim Bond
Bob Bleeth
Bob Daggelso
Harlan Williams

ADDRESS
Love
Emelith 417 Park Ave
Gilroy 4010 Chestnut Ave

Emelith
Helene
<table>
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<td>Judy Vegra</td>
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</tr>
</tbody>
</table>
Name

Dave Dickson
Tim Dickson

Address

319 N. Broadway
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.

Page 3-32
P.6-6: We strongly advise the use of the techniques listed in this section, with the exception of wetland treatment (see following comment).

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.

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.

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

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

RESPONSES, CONT.

This comment is acknowledged by the DNR. In Section 2 of the Draft EIS, it is indicated that such a permit may be required.

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.

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 unequivocable 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.

Page 3-34
Ms. Rebecca A. Wooden  
Environmental Planner  
Office of Planning  
Dept. of Natural Resources  
500 Lafayette Road  
St Paul Minnesota 55155-4010

Dear Ms. Wooden:

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 its 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.

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

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.
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.

RESPONSES

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

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.
The City of McKinley objects to the placement of the proposed dumping site of the Laurentian Taconite Mine. The proposed area is much too 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.

RESPONSES

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

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.
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.

The City of McKinley objects to the closing of Old Highway 4135. The only other access in and out of town is county road 420. 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 approx. 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.

RESPONSES

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

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

Please use additional sheets if you need more space. Thank you for your help.
July 27 1990

Dear Ms Rebecca Wooden:

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

Mary M. Cofaliter
City Clerk

Page 3-43
22 July, 90

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

Re: Raw water intake, Corsica Mine

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,

[Signature]
Peter Baker, P.E.

enc.

"MUNICIPAL & CONSTRUCTION ENGINEERING SERVICES"

RESPONSES

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

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.
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. Similarly, but for various reasons, alternative haul road alignments were held to be either unacceptable or undesirable by the proposer.

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. 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 (± 400 tons when loaded) would be enormous, and such a cost increase would likely affect the proposer’s selection of a preferred alternative.

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 proposal 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.

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.
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.

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.

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

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.

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.

Page 3-48
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:

<table>
<thead>
<tr>
<th>Common Name</th>
<th>Scientific Name</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>bald eagle</td>
<td>Haliaeetus leucocephalus</td>
<td>Threatened</td>
</tr>
<tr>
<td>gray wolf</td>
<td>Canis lupus</td>
<td>Threatened</td>
</tr>
<tr>
<td>peregrine falcon</td>
<td>Falco peregrinus</td>
<td>Endangered</td>
</tr>
</tbody>
</table>

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.

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 unminable. 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

July 30, 1990

Rebecca Wooden  
Office of Planning  
Department of Natural Resources  

James F. Walsh, Hydrologist  
Well Management Unit  
Section of Water Supply and Well Management

Proposed Laurentian Taconite Mine Draft Environmental Impact Statement (EIS)

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

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.

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.
July 25, 1990

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

Dear Ms. Wooden:

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.

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.

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
Dennis Sandstrom, Councillor
Herbert Clapsaddle, Councillor
Marco Biondich, Councillor
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.
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.

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 decision. The wet and wildlife area disturbed would be miniscule if alternate routes are 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 #3 would at least put part of a natural barrier against the dust and noise. Also paving the road wasterly 6000 feet from Route #3 would create a natural barrier that would subdued 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
200 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

3.1.13 Mr. Thomas Juth

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
Address: ____________________________  10 West Michigan Box 744
City, State, Zip: ____________________________  Gilbert MI 53741-1844

Please use additional sheets if you need more space. Thank you for your help.
Dear Ms. Wooden,

Thank you 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 Laurenton 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-liners cross the river and we have to pay taxes on the river bottom land. We 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 regardless 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 nickel to further contaminate our river and lake. Considering the mine has a 40 year potential, 40 years of shuling could turn Pike River into an acid pipeline to Lake Vermillion.

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

Respectfully,

Mrs. 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 0.072 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.
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 fragariodes) 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.
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.
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
Ms. Rosemary Norha

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.

This comment is acknowledged by the DNR. The Draft EIS is thorough in its assessment of environmental impacts from the proposed project.
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.
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 (Cypripedium), or any member of the orchid family, trillium of any species, lotus (Nelumbo), gentian (Gentiana), arbutus (Epigaea), 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 (10552-1, 10552-2, 10552-3)
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.

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.

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.

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 Holmes 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.

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.

17F| 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.

17G| 

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 Skrbeck, 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.
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:


   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.


   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.
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:

<table>
<thead>
<tr>
<th>Comment submitted by</th>
<th>Comment Number(s)</th>
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</thead>
<tbody>
<tr>
<td>Mayor Karl Oberstar, Jr. City of Gilbert</td>
<td>1A to 1B</td>
</tr>
<tr>
<td>Mr. Mark St. Lawrence, representing 31 individuals and families signing a petition addressed to the DNR</td>
<td>2A to 2E</td>
</tr>
<tr>
<td>Mr. Mark St. Lawrence, representing 405 individuals and families signing a petition addressed to the DNR</td>
<td>3A to 3C</td>
</tr>
<tr>
<td>Ms. Debra L. McGovern, Minnesota Pollution Control Agency</td>
<td>4A to 4L</td>
</tr>
<tr>
<td>Mayor Joseph Vaida and Ms. Mary Cossalter City of McKinley</td>
<td>5A to 5C</td>
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<tr>
<td>Ms. Mary Cossalter City of McKinley</td>
<td>6A</td>
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<td>Ms. Mary Cossalter City of McKinley</td>
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<td>Ms. Mary Cossalter City of McKinley</td>
<td>8A</td>
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<tr>
<td>Ms. Mary Cossalter City of McKinley</td>
<td>9A</td>
</tr>
<tr>
<td>Mr. James L. Smith, U.S. Fish and Wildlife Service</td>
<td>10A to 10N</td>
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<tr>
<td>Mr. James F. Walsh, Minnesota Department of Health</td>
<td>11A to 11B</td>
</tr>
</tbody>
</table>
Mr. Karl Oberstar, Jr., Mayor
Mr. Dennis Sandstrom, Councillor
Mr. Herbert Clapsaddle, Councillor
Mr. Marco Biondich, Councillor
Mr. Joseph Gentile, Councillor
City of Gilbert
Mr. Thomas J. Juth
Mrs. Sandra Wiermaa
Ms. Rosemary Norhu
Ms. Rosemary Norhu
Mr. Jacob Bradach and Ms. Michelle Bradach

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

EIS Staff Review Team
Frank Svoboda, Barr Engineering

900041-02
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.
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.
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 Roucheleau Taconite Reserve. Filling of those pits would render that reserve unminable.
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.
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