

PUBLIC HEARING WRITTEN TESTIMONY**PUBLIC INFORMATION HEARING****DRT Sands, Inc.****3/31/15**

Louise Cody, 21851 27th Street, Bloomer, WI 54724

The reclamation plans for DRT Sands and the other nonmetallic mines in Chippewa County state that mining will occur in phases and reclamation will be done on a continual basis. It states that the amount of land opened up is based on market demand for the sand. However, since the mines in Chippewa County are all clustered in a concentrated area, there is a great likelihood of an extensive amount of land being opened up during a boom in demand. In addition, a boom in demand would likely reduce reclamation efforts by the companies. Because I live in the center of the mining district, I am greatly concerned with the hazards of having so many acres exposed and being mined at once. I would like to see a limit on the amount of acres that can be open at one time. Reclamation needs to be completed based on the health, safety, and welfare of the residents living in the area and not on based on market demand. This is even more important with so many mines being permitted in a concentrated area. I would like DRT's reclamation plans to state a limit on the amount of acres open and that reclamation shall take place immediately when new phases are being mined.

In the water study being conducted by Chippewa County, it showed that reclaimed land does not see any decent measureable infiltration until around the 20-30 year mark. I think it is important to maintain and hold the land in reclamation to establish recharge especially with such a clustered mining area and with such a large amount of acres being mined in Northwest Chippewa County. My concern is that reclamation will be released too soon and the post-secondary land use will not have enough time to establish. I hope Chippewa County holds the reclamation to at least 20 years to establish a successful post-secondary land use and allow a significant recharge rate for our area's surface and groundwater. I know the County is currently working on standards, but something more specific should be included in DRT's reclamation to ensure successful reclamation.

After looking at the plan's map, I noticed the wash plant of the mine site is located near the wetlands on the property and the flow to the Trout Creek. Also, the driveway lies directly on the flow line of the wetlands. I am concerned about unwanted materials from the wash plant and driveway leaving the mine site. The driveway should not restrict the water flow and the wash plant should not be located so close to the wetlands and the water flow because of the increased risk of contaminants leaving the mine site.

Another area of concern is that the Chippewa County Forest is adjoining DRT's mine site along with other heavily forested land. Chippewa County is in part of the state that has issues with oak wilt. According to data on the WI DNR website, the risk of spreading oak wilt significantly increases around April 15 and significantly decreases after July 15. I would like to see Chippewa County restrict forest clearing during this period to protect the forestland in this County. I personally have 15 acres of forest close to the site that is primarily made up of red oaks, which are highly susceptible to oak wilt. I would also like to see Chippewa County protect the use of their forest land by increasing the buffer area of DRT's mine with the Chippewa County Forest. I think it is imperative for the safety of those using the land and to protect the forest's land use.

Ben & Melanie Dachel, 21515 Co. Hwy. DD, New Auburn, WI 54757

We have a few concerns about the reclamation plan for DRT Sands in the Town of Auburn:

1. According to the reclamation plan, the waste material from the wet processing plant is being used in the reclamation process. The waste material will have residue from the flocculants or other chemicals, such as acrylamides, that are used in the process. There needs to be monitoring of any of these chemicals that may be found in surface water which eventually make its way to trout streams and groundwater far from the site. What will be done to mitigate this if these chemicals are found offsite?
2. Section 3.2.8 talks about vegetation to be used as screening from view of surrounding land uses. I want to make sure that the screening that is put in is not seedlings. If the purpose is to provide a screen, then the trees that need to be put in have to be some type of larger nursery stock.
3. The bonds that are collected to make sure the reclamation is done should not be released until a minimum of 10 years after DRT considers reclamation complete. We need to have some type of insurance that the plantings have taken hold and will remain viable. This performance period is critical to making sure that we are not left with fields of invasive weeds or nuisance plants.
4. I feel that the setback from the public land should be a much greater distance to preserve the integrity of the purpose of the public county land. There are already two mines approved within a ½ mile of this public land. This will create stress on this habitat and an unenjoyable experience for anybody who chooses to use it for recreation or hunting, especially considering that these three mines can run 24/7.
5. I'm including a document from SCS engineering, which is a firm that our township hired to recommend additional protections for the township. I am asking that the County include the extra monitoring wells, increase the frequency of monitoring, and expand the proposed list of groundwater analytical parameters that the firm recommends. (See attachment with comments)

Mike Dahlby, Chippewa County Dept. of Land Conservation & Forest Management, 711 N. Bridge Street, Chippewa Falls, WI 54729

RE: Written testimony regarding DRT Sands, Inc. Reclamation Plan, Non-Metallic Mining, Town of Auburn, Chippewa County, WI

To whom it may concern:

DRT Sands has applied for a Non-Metallic Mining Reclamation Permit for a 245 acre site in the Town of Auburn. A Chippewa County Forest Special Unit shares approximately ½ mile of boundary with the proposed mine site (Phases 4,5 and 6). Please accept these formal comments for consideration as part of your permit application review process.

Chippewa County received this land as a gift from Dennis and Noreen Gilberts in 1999. The Gilberts made this donation with the intent that the site be managed for timber, wildlife, and non-motorized recreation. The Gilberts desired to “preserve it from residential or commercial development”. Given the changes occurring in the landscape surrounding this County Forest Special Unit, the site’s importance to wildlife has increased dramatically in recent years.

Pursuant to Chapter 16 of the Chippewa County Code of Ordinances, the County Land Conservation & Forest Management Committee is responsible for providing policy oversight relating to County Forest lands. As County Forest Administrator, I am responsible for performance and enforcement of the

administrative and management functions of Chapter 16. One of the duties set forth by Chapter 16 is to do all things necessary for the protection of forests whether from fire, insects, disease, trespass, or damage from other causes.

I have reviewed the narrative and maps provided with the Non-Metallic Mining Reclamation Permit application. It would appear that the proposed activity will affect the County Forest Special Unit in, at least, the following ways:

1. The proposed activity is likely to increase wind within the County property. It is reasonable to anticipate that during the life of the mine and upon reclamation, wind will have a greater impact on the County property than it did prior to mining. The increased wind will result in:
 - a) A dryer moisture regime due to increased evaporation. The dryer moisture regime may result in a shift of habitat type (i.e. vegetation) particularly relating to the herbaceous and shrub layers. If this change occurs abruptly, invasive species may colonize new habitat niches that are created. A dryer site would also be more susceptible to wildfire.
 - b) Increased risk from native and non-native insects and disease. Many insects and diseases are aided by wind. The economic and ecological risks associated with these pests are widely understood. The County land was subject to insects and disease prior to the proposed mining, however the rate of influx may come to exceed the lands capacity to fend off these threats.
 - c) Increased risk of wind throw. Most of the County land is managed for oak and there are also aspen stands near the subject. Both of these species are susceptible to wind throw, particularly sites with shallow soil. Especially within the oak component, the individual trees most likely to be affected are currently relied upon to provide acorns for natural regeneration and food for wildlife.
2. The proposed activity will increase the risk of oak wilt on the County land and other adjacent properties. Oak wilt spreads above and below the ground. The 50' buffer may not be adequate to protect the adjacent properties from oak wilt. This is a major concern because the timber stands on the adjacent County land are managed for oak.
3. The proposed activity will increase local susceptibility to invasive species. Many invasive species are adept at colonizing sites that experience frequent disturbance. These types of sites are common vectors to adjacent properties. The economic and ecological risks associated with invasive species are widely understood.

To reduce the negative impacts and/or risks listed above, the mine operator could implement a few strategies that do not appear to be described in detail in the Non-Metallic Mining Reclamation Permit application. A few strategies to consider might include:

1. To decrease the risk associated with increased wind, the 50 foot property buffers would ideally contain a herbaceous and shrub layer, as well as a multi-story tree canopy. A substantial spruce component would be of benefit. Where possible, wider buffers that are adequately vegetated would help.
2. Excavation near property borders that are wooded should be avoided between April 1 and July 15 to reduce risks of damaging the roots of oak trees.
3. If wooded, the 50' property buffers should be routinely inspected by professionals with adequate technical expertise to identify symptoms of oak wilt. In the event of an oak wilt outbreak within the 50' property buffers, DRT Sands should be obligated to install root graft barriers or other techniques as approved by the adjacent landowners.

4. The entire site should be subject to annual monitoring, specifically for plants considered invasive under Wisconsin Administrative Code, Chapter NR 40. All identified plants should be treated appropriately and efforts should be made to determine if the plants have spread off of the subject property.

Thank you for the opportunity to comment on this mine proposal. Please do not hesitate to contact me if more detailed information would be of benefit as you complete your review of the Non-Metallic Mining Reclamation Permit application.

Lee Boland and Katherine Stahl, N7607 1010 St. Elk Mound, WI 54739

From: Katherine Stahl [<mailto:stahland@centurytel.net>]
Sent: Monday, April 06, 2015 4:13 PM
To: Dan Masterpole; Seth Ebel
Subject: DRT reclamation plan testimony

Dan Masterpole
Seth Ebel
Chippewa County Department of Land Conservation and Forest Management
711 N. Bridge Street
Chippewa Falls, WI 54729

Dear Mr. Masterpole and Mr. Ebel:

Please consider this part of the hearing testimony for the DRT proposed sand mining operation you detailed on the evening of March 31st at the Courthouse.

We are very concerned about the proximity of the proposed mine to wetlands and streams. How will the altered landscape impact the hydrology of the area which in turn impacts the wetlands and streams? With 50% of the wetlands already lost in Wisconsin, our waters can ill afford further loss or impacts on our wetlands. During the hearing it was noted that there would be a 50 foot distance from streams and wetlands. Since water flows can be greatly impacted by land distance far greater than 50 feet, we would like assurance this is an adequate distance resulting in zero loss of wetlands and water reduction in the neighboring stream.

We should study in more detail the effects of springs and side hill seeps as potentially significant sources of supply for the streams typical of this sand ridge terrain. While we haven't had an opportunity to thoroughly study the current DRT mine proposal and its specific geography/geology we're aware that at our own nearby location our small perpetually flowing stream is fed by springs and seeps much farther than 50 feet from its centerline.

We ask that monitoring of the reclamation post cessation of mining continue for an extended period such as twenty years in order to assure there has been adequate provision in the reclamation efforts for the health of the neighboring wetlands, surface waters, and domestic wells.

Therefore we ask you will look closely at the impacts of the mine on the wetlands and streams during your review of the DRT proposal.

Thank you for considering this.

Respectfully,

Lee Boland, (retired) P.E. & R.L.S.

Katherine Stahl
N7607 1010 St. Elk Mound, WI 54739
715-962-4010

Louise Cody, 21851 27th Street, Bloomer, WI 54724 - Email

From: Louise Cody [mailto:lao_81@hotmail.com]
Sent: Monday, April 06, 2015 12:11 PM
To: Dan Masterpole
Subject: Cody Public Hearing Comments DRT Sands

Dan,

I would like to submit a map with my earlier public comment for DRT Sands reclamation to illustrate the cluster mining and probable cumulative impacts facing the Town of Auburn. Let me know if you cannot see the map clearly and we can make a higher quality version.

Thank you,

Louise A. Cody
21851 27th Street
Bloomer, WI 54724
715-658-1986

