

Mr Hargis, Mr Storm,

The attachment is my comments for Excelsior Energy's Draft EIS for the sections I reviewed.

Thank You!

Frank R Weber
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Mr Storm,

Attached are my questions and comments noted in the review of the Draft EIS for the Excelsior Project.

3.5.1.1 "As most of the taconite mining in the area has ceased," only Butler was a taconite mine and ceased operations in 1985

3.5.7 Prairie River....Flow data collected 1967 to 1983 and 2001 to present? DNR was installing flow metering in August of 2007 Mean annual flow was established to be 319 ft³ per second using the old data so it would allow 2,468 gpm to be withdrawn? DEIS states water will be taken below Prairie Lake dam, approximately 8 miles from the site. No mention of pipe line, power line, pumping stations needed to move the water to the power plant site.

Figure 3.15-1 shows West Range Site at KELLY LAKE???

3.16-2 cites 2 closed landfills, doesn't mention Nashwauk or Nashwauk Township sites.

3.15.1.1 cites commercial airport in Grand Rapids (ceased operations three years ago, **iron ore** being shipped out of Duluth and a four lane highway system (still not completed across the Range).

3.14.2.1 During high groundwater or rainfall, the main wastewater pump station in Taconite cannot handle the additional flows, creating a need to bypass untreated wastewater into a natural pond system. Draft makes no mention of correcting the problem before additional waste will be added to the problem.

3.13.4.1 School Districts, does not include Bug-Oh-Nay-Sha, Hill City or Big Fork.

3.11 Socioeconomics for West Range were based on Iron Range Township, City of Taconite, AND SEVERAL OTHER JURISDICTIONS? What "jurisdictions"? Does this include everything from Hibbing to Grand Rapids.....what is usually referred to as the "West Range".

Table 3.11-1 shows Itasca County population has increased since 1980? Range population was at a high point when the 1980 census was completed. Drop started early in 1981 when part of Butler was not called back after shutdown.....big drop came when Butler shut down in 1985. Current population is 700 above the 1980 level and does not include seasonal additions which more than doubles Itasca's population.

3.5.1.3 Site is potentiometric high? Groundwater flow is firmly established to be north to south due to the Giant's Ridge Batholith. Surface contamination due to handling, storage of coal, storage of waste products (especially during road restrictions and while water is too solid to control dust), rainfall/snowfall en route to the surface,.

3.9.2.1 Has Native American burial mound at Big Sucker Lake been examined yet?

3.10.5 Publicly owned lands....cites parcels that would be used for corridors.....60% Itasca County, 34% State. Is the remaining 6% private?

3.10.3 Land Use Planning: Objectives of the Comprehensive Land Use Plan for Itasca County, Paragraph 1 "The plan also recommends the use of tax incentives to encourage private lakeshore owners not to develop, subdivide, or plat undeveloped lakeshore or environmentally sensitive areas." One family on Lower Lawrence Lake with 400 feet of lakeshore saw an increase of \$800.00 this past year?

3.8.2 Aquatic communities.....There are fish in every pit. Accepted spelling is Oxhide Lake, not Ox Hide

3.8-13 Second paragraph: None of the waterways or water bodies in the area is considered to be cold water due to the lack of naturally reproducing trout populations Paragraph five: In past years the Canisteo Pit was stocked with lake trout, and the population has become self-sustaining.

3.8-1 "Disturbed habitat from recent clear-cutting was widespread and was the primary reason for the diminished quality in wildlife habitat" Then. 3.8-2 Last paragraph states "The most common forested terrestrial habitat onsite is characterized as the northern mesic hardwood forest".

3.8-8 "An unnamed designated trout stream drains into Swan Lake (east of Pengilly) This is Pickerel Creek.....The Minnesota Steel Project is going to eventually eliminate it anyway
3.8.1 Listed animal species expected to inhabit the site do not include deer, bear, rabbits, grouse, red and gray squirrels, beaver, muskrat, otter, mink, herons, wolf, fox, coyote
3.7-11 Type 7 Wooded Swamp: third paragraph, last sentence: These large complexes provide much of the natural drainage through the site and are hydrologically connected to other upstream and downstream resources outside the project area. They know this flow will contaminate the water bodies to the south.
3.7-8 Last paragraph: The majority of wetlands identified have a connection to interstate commerce. What is the meaning of this statement?
3.7.4.1 desktop review A soil survey has not been completed for St Louis County.....why not?
3.7.2 Regulatory Framework...first paragraph The MPCA currently performs Section 401 water quality certifications for the state. In 2007, the MPCA added an additional 287 lakes to list of "Impaired waters"
3.6.2 Local hydrology Features: Watersheds.....to the north and west of site, The Prairie River drainage system actually starts in St Louis County and is much larger than the 300+ square miles quoted.

Appendix

5.1 Land use: "The site is currently unoccupied by any residential dwellings and has no direct access" . How does this fit requirement for Infrastructure in place or section 3.8-1 of the Draft?
Page 6 Estimates on chromium based on Wabash River Project? Wasbash is using petcoke and doesn't run fulltime.
Page 18 Mercury loading of Diamond Lake estimated to be .08 g/yr??? From Excelsior but 16.51 g/yr from BACKGROUND??? How does this apply to D.1 Federal requirements for "cumulative impact" IRT MSI, Keetac, Evtac, Hibbtac, etc, etc
D.4.1 Impacts of train traffic on regional communities between Grand Rapids and Hibbing.....what about the rest of Minnesota's communities that are along the proposed travel route?
D.6.3 Mercury Deposition and bioaccumulation.....info we will get from Excelsior? RIGHT!!!
D.6.4 Air Toxins.....Please read....we will depend on Excelsior for information Nice witch's brew of known toxins that "**may potentially** contribute other hazardous air pollutants"??????
D.6.5 Water supply....Partridge River is East Range site.

Cumulative air quality impact analysis section.....no page numbers Sec. 2 Read paragraph that starts "Mercury emissions were modeled only for sources for which emissions data were available".....leaves a lot of room for error?

And 4.1 Mesaba Project contributions to total cumulative impacts are small relative to total expected concentrations. Already bad so let's add JUST a little more?? What is this saying about MSI?

D.6 Trains Mesaba 1 and 2 are listed under East Range? But 4 trains per day (two in, two out) is not the four or five per week that has been discussed at the public meetings.
Local train traffic from GR to Superior would likely resume..... This could accommodate MSI's needs of 70-90 cars per day (10 incoming, the balance outgoing) How do the cars get there?