

S.O.S. DUNES NEWS

SPECIAL BULLETIN

Save Our Sand Dunes

S.O.S. DUNES NEWS IS PUBLISHED INTERMITTENTLY BY PRESERVE THE DUNES, INC.

May 5, 2004



"Those dunes are to the Midwest what the Grand Canyon is to Arizona and the Yosemite to California. They constitute a signature of time and eternity; once lost, the loss would be irrevocable." *Carl Sandburg (And at the Nadeau Pit in Covert Township, Michigan, they are almost gone.)*

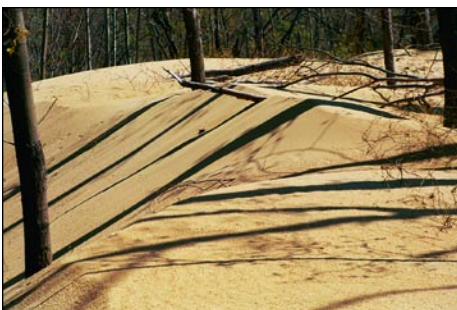
HEARING SCHEDULED

The Geological and Land Management Division of the MDEQ has scheduled a hearing on the application for a permit to enlarge the lake at the Nadeau Pit to 36 acres. It will be held at 7:00 PM on Wednesday, May 19, 2004 at the Covert Township Hall.

PTD's review of the permit application indicated that there were numerous omissions and errors in the application. You may get a copy at the PTD web site: <http://www.daac.com/sodunes>. You will find a link to it on the "Home" page and the "Meetings" page. Our initial response can be found in these same locations.

SCOPE OF WORK

In their 1998 permit application TechniSand stated that they would complete dredging of a 29 acre lake in four to five years and that 350,000 cubic yards of



Blown sand in Nadeau Pit above Rogers Creek

sand would be removed.

Six years later, TechniSand estimates in the current application that they will dredge 260,000 cubic yards of sand to enlarge the lake to 36 acres and that they will complete mining in four to five years.

Neighbors might well be concerned about the resulting 13,000 truck movements required to ship the sand from the site — especially since they had been told that mining would be completed by now.

IMPACT ON ROGERS CREEK

PTD is concerned about potential harm to nearby Rogers Creek, a natural trout stream and the adjacent wetlands. This is a real and significant threat.

In December 1997, PTD notified the MDEQ that TechniSand had been dredging for 4 1/2 years without a permit. In January 1998, TechniSand applied for a permit for dredging a lake with a surface area of 75 acres, but submitted supporting documents for a 29 acre lake.

On May 5, 1998, the hearing was held regarding creation of a 29 acre lake. Subsequently, TechniSand was requested to submit an environmental impact study addressing specific questions raised at the hearing.

In December they submitted their report. PTD's consultant and the DEQ's LWMD Hydrology Section found that the report was flawed and had reached erroneous conclusions.

The MDEQ analysis indicated that the dredging activity could reduce the flow in Rogers Creek by 0.22 cfs (cubic feet per second) or about 100 gallons per minute. This is a significant portion of the flow. Half the time the flow is less than 1.0 cfs. So dredging activity reduces the flow by *at least 22%* during 50% of the time. Furthermore, it reduces the flow *by 44%* during 5% of the time.

By 1998, the level of the lake had already dropped 7 feet below earlier levels. As a result, a comparable reduction in flow volume had already occurred.

Despite these findings, 11 months after the hearing, a permit was issued for creation of a 36 acre lake. **There has never been an explanation of why the lake area was increased to 36 acres!**

TechniSand was required to report water level measurements in the lake, the creek and at monitoring wells. Unfortunately, none of the specified measurements can determine changes in flow in the creek.

Our observations indicate that flow was reduced to historic lows. The forecasts made by the Hydrology Section

were correct. Also, the temperature of the water in the creek has increased.

We are concerned that the creek has already, or is about to, deteriorate to such an extent that it can no longer provide habitat for trout and other aquatic life normally found in cold water streams.

Therefore, we are requesting an evaluation of the creek by DNR, Fisheries Division and a comparison to their findings made prior to mining. If their observations agree with ours, then **the permit should not be issued.**

AQUATIC RESOURCES?

The permit application promises creation of aquatic resources. Will the lake be a "resource" or just a scum covered pond.

We are asking that requirements be placed on the lake so that it will be a healthy lake, capable of supporting aquatic life, not just algae.

IMPACTS ON RECLAIMED SLOPES

To create the 36 acre lake as shown in the permit application, TechniSand will have to remove sand from areas that have been previously strip mined and reclaimed.

Re-opening cells for mining will extend mining operations for years into the future to ensure that vegetation will survive for the minimum of a year.

PROTECTIONS

The 1999 permit had some specified "protections:"

- An on-site wetland was to be maintained.
- Nearby wells were to be replaced if it was shown that dredging reduced quantity or quality of the water.
- To insure safety, the lake bottom would be graded to 1:6 slope to a depth of 6. This is a maximum slope for safety.
- Dredging would be complete in 4 to 5 years (by January, 2003, at the latest).

How have they performed?

The wetland area is still there, surprisingly.

Tests of at least one nearby well indicated a significant rise in manganese.

The underwater slopes have been left in places at 1:1 or steeper. Though these areas are in "reclaimed cells" in the sand mine the MDEQ has responded that there is no requirement for grading to 1:6 slopes until all mining is complete. (This is not what the law says.)

Now TechniSand is applying for another 5 year permit. Why are they not simply asking for a renewal? We suspect that they want to avoid providing these protections.

PTD is requesting that, if a permit is issued, these protections be made a part of the new permit.

WHAT YOU CAN DO

PTD, Covert Township and Thunder Mountain Heights Association have all requested this hearing.

It is important that we have a big

turnout of concerned citizens who will speak out against uncontrolled and unnecessary destruction of our natural resources — especially those on adjoining property and not owned by TechniSand.

If you are unable to come, put your comments in writing (reference File No. 04-80-0013-P). Comments should be addressed to:

Geological & Land Management
Division
7353 Adobe Road
Kalamazoo, MI 49009-5026

We will deliver your comments to the MDEQ at the hearing if you mail them to:

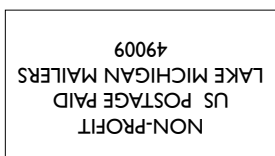
Preserve the Dunes, Inc.
P.O. Box 581
Riverside, MI 49084-0581

SAND DUNE DAY

Sand Dune Day is May 19. To celebrate, PTD has scheduled a special dune walk for Sunday, May 16 at 2:00 PM. The walk will be held at the Van Buren State Park. Chuck Nelson, Director at Sarett Nature Center, will be our guide.

Entry into the park normally costs \$6 per car (\$8 for out-of-state cars). You can pay at the gate or enter for free as a guest of PTD by using the voucher in the last newsletter. The ticket is good for May 16 only. Please carpool to reduce costs.

This is a chance to visit the park and see an example of moving dunes that you may not have seen before *and* have Chuck as your guide.



ADDRESS SERVICE REQUESTED

Preserve the Dunes, Inc.
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Riverside, MI 49084-0581