

Anne Hurlburt, City Administration; City of Scandia  
14747 209th St. N.  
Scandia, MN. 55073

9/5/12



Re: Zavoral/Tiller Mine Operation FEIS Response  
Ms Hurlburt,

We are Larry and Mary Whitaker. We reside at 625 Pine Cone Trail, Marine on St. Croix.

**Safety:**

I question the validity of the "Level Of Service" numbers stated for the intersection of Hwy 95 & 97.

The current values for a Northbound left turn are stated as 8.0 - 8.4 seconds. The scenario for Alternatives 1-3 is 8.0-8.5, a .1 sec increase, yet the time required for a westbound truck to pass through the intersection will take 16.9 – 18.6 seconds.

Alternative 1 through 3 has this happening 280 times in a 10 hr day. Sub alternative 3A has this occurring 368 times in a 12 hr day.

I believe traffic control should be reexamined.

**Road congestion / Business Effect:**

The EIS states that the "LOS" will drop from "C" to "D". These levels are very subjective. Can they be quantified?

Level "D" states these conditions "will result in a considerable drop in operating speed" and that they "can be tolerated for a short time". This will negatively affect the "tourist travelers" who are very important to the local businesses such as Marine General Store, Scandia Café, Mi Casa, Olives, Scandia Liquor. The travelers will not subject themselves to the extra frustration on the road. I believe this FEIS should study this effect on local businesses and civic groups. Please quantify.

**Monitoring & Enforcement:**

The EIS states that Scandia will be responsible for monitoring and enforcing the requirements of the CUP. It also implies that enforcement would be a function of CUP renewal. An annual enforcement would mean nothing!!

Please provide specifics as to who will be doing the enforcement, how will the enforcement be conducted, and how frequent will reviews be made to address the needs of the community. Will the enforcer have authority to stop the mining operation when violations occur, not at a later date?

**Liability:**

***This point from my previous letter has not been addressed.***

In the event of an unusually heavy rain event that causes a “wash out”, or a chemical contamination that flows into the St. Croix River, who will be held responsible to “clean up” and otherwise restore the river to its current condition?

This liability commitment must extend long after the active mining operations are completed.

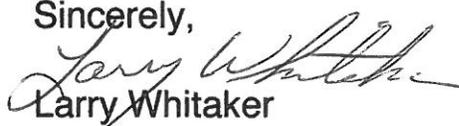
**Common Sense and Credibility:**

The current Scandia Comprehensive Development Plan does not allow mining on that site. Why is this mining operation even being considered?

What is the cost/ benefit scenario for Scandia in this mine? The mine will result in a hole in the ground that will have limited if any tax value. The land as it is, could be developed and provide a tax base that will surely surpass the limited amount of tax income the mine will provide.

**Will the proposed 'tax' benefit from this mine outweigh the costs to the community, in dollars, potential damage to our river, drop in housing values and serious potential safety risks on the highway?**

Sincerely,

  
Larry Whitaker

  
Mary Whitaker

Cc: TA-COS