

## Anne Hurlburt

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**From:** Andrew\_Horton@fws.gov  
**Sent:** Friday, May 18, 2012 4:59 PM  
**To:** a.hurlburt@ci.scandia.mn.us  
**Subject:** Zavoral Mine and Reclamation Project Draft EIS

May 18, 2012

Anne Hurlburt  
City Administrator  
City of Scandia  
14727 209<sup>th</sup> Street North  
Scandia, Minnesota

Re: Zavoral Mine & Reclamation Project Draft EIS  
03E19000-2012-CPA-0049

Dear Ms. Hurlburt:

Thank you for the opportunity to comment on the Zavoral Mine & Reclamation Project Draft Environmental Impact Statement (EIS). The proposed mining operation is located near the St. Croix River and within 2000 feet of federally endangered winged mapleleaf (*Quadrula fragosa*) and snuffbox (*Epioblasma triquetra*) mussel species. Higgins eye pearlymussel (*Lampsilis higginsii*) and spectaclecase (*Cumberlandia monodonta*) are also anticipated to be within this area of the St. Croix River and east of the three creeks currently draining the Zavoral Mine site. This project is anticipated to reduce off-site peak flow, risk of erosion, & overflow and improve infiltration which may benefit mussels. However, we still have concerns over increased sedimentation that may occur during the mining process, potentially resulting in impacts to mussel species. We have reviewed the Zavoral Mine Draft EIS and provide the following comments.

1) The last paragraph on ES-1 states that the average depth of mining will be 15 feet (ranging from approximately 10-70 feet deep) and that the maximum depth between mining excavation and groundwater would range from approximately 25-50 feet. Based on cross-section figures 35-39 it appears that the site would encompass more than a 15-foot average excavation. Please clarify this. We would also like clarification from the applicant that while the required minimum separation distance is 3-feet, this project will only mine to within 25 feet of the groundwater table. It appears there has been some confusion by previous commenters over the mining depth in relation to the groundwater table that this may clarify.

2) Page ES-5 states that no threatened or endangered species are known to exist or identified during site surveys. We believe this section should say that two endangered winged mapleleaf (*Quadrula fragosa*) and snuffbox (*Epioblasma triquetra*) mussel species are known to occur within 2000 feet of the project; however, these species do not occur on site.

4) Page ES-6 & ES-19 state that “immediately after soil stripping, & prior to overburden removal, several short periods (matter of days or less for each occurrence) when potential impacts to downstream water resources could occur.” Please include an estimate of the number and scale of each occurrence that is expected and determine if there will be any cumulative effects that may impact listed mussels.

5) It appears that peak flow rates off the property will be significantly decreased during the mining process. To help ensure that all best management practices are followed and unexpected sedimentation does not occur and harm mussels, please provide a list of the Best Management Practices (BMP) that you are intending to use.

Thank you for the opportunity to provide comments on this project.

Sincerely,

Andrew Horton  
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U.S. Fish and Wildlife Service  
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