

Scoping Decision Document
Holcim-MWR, Inc.
Larson Quarry Grey Cloud Island Township

Washington County, Minnesota
June 5, 2025

Responsible Government Unit: **Washington County**

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1.0 Introduction

Holcim-MWR, Inc. (Holcim) currently operates a limestone quarry, known as the Larson Quarry, located in Grey Cloud Island Township, Washington County, Minnesota. Holcim (formerly Aggregate Industries) proposes to expand the existing quarry (Project) onto a 148-acre property (Site or Project Area) located east of County Road (CR) 75, the majority of which they have owned since 1972. No change in quarry operations or production levels is proposed. The expansion will extend the life of the mine by 20-25 years.

A mandatory Environmental Assessment Worksheet (EAW) was prepared for the Project and was noticed in the EQB Monitor on December 3, 2024. A public comment period was held from December 3, 2024 to January 17, 2025 and a public informational meeting was held January 9, 2025 at the Grey Cloud Town Hall. Based on the information in the EAW and the comments received, it was determined that there is a potential for significant environmental impact. The Washington County Board of Commissioners adopted a positive declaration on the need for an Environmental Impact Statement (EIS) on February 18, 2025.

When the Regulatory Government Unit (RGU) orders an EIS at the end of an EAW process, the scoping process and procedures differ from those used if the EIS is mandatory or voluntary. In accordance with the Environmental Quality Board (EQB) Guidance (EQB, 2010) a scoping EAW is not prepared and the EAW and the record of decision documenting the need for an EIS supplies the necessary background information to scope the EIS. A public meeting was held on May 28, 2025 to review the scope of the EIS in accordance with Minn. Rule 4410.2100 Subp. 4.

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2.0 Scoping Process

The scoping process is used to reduce the scope and bulk of an EIS and identify only those potentially significant issues relevant to the proposed project, define the content, alternatives, level of detail, timetable for preparation of the EIS (Minn Rules 4410.2100 Subpart 1). This Scoping Decision Document (SDD) establishes the intended scope of the EIS and identifies the issues that will be examined in depth in the EIS. The purpose of the SDD is to facilitate the delineation of issues and analyses to be included in the EIS and identify the environmental topics and alternatives that will be examined in depth in the EIS. The SDD also presents a tentative schedule of the EIS process.

The Washington County Board adopted a resolution making a positive declaration on the need for an EIS on February 18, 2025. A notice of the EIS public scoping meeting was published in the EQB Monitor on May 13, 2025. The public scoping meeting was held on May 28, 2025. This SDD was prepared based on the EAW administrative record including specific findings of fact supporting the positive declaration, and public scoping meeting comments received. The EIS will be prepared in accordance with the Final SDD adopted by the County Board.

3.0 Purpose and Need

The Project purpose and need is to expand an existing limestone quarry into an area with an accessible verified limestone deposit within an established service area on lands controlled by the Proposer. The expansion is needed in order to maintain the supply of construction aggregates to surrounding communities, including portions of Washington County and the Twin Cities metro area. The eastern reserves are located on property owned by the proposer since the 1970's. Permitting these reserves has been part of Holcim's long-range plan for full development of the quarry since they were acquired. Limestone within the existing quarry is nearing exhaustion and therefore the Proposer is now seeking to expand the quarry to include the eastern reserves. Limestone extracted from the expansion area will be transferred to the existing Larson Quarry operations area where it will be processed into various aggregate products. Final product will continue to be transported up the river by barge for distribution or transported by truck to supply local projects.

Construction aggregates are a basic raw material that the construction and agricultural industries depend upon. Construction activities utilize most of the aggregate produced in Minnesota including crushed aggregate in concrete and asphalt pavements, drainage base under roads, sewers, parking lots, and sidewalks. Aggregates are the main component of concrete mixes used to construct bridges, buildings, and pre-cast blocks. Aggregate resources are critical and finite. Finding high quality aggregate resources that are readily accessible is challenging because prime aggregate lands continue to be lost from expanded urbanization and suburban development pressure.

The eastern reserves are a proven high-quality deposit located in an area that is guided by the Township for mining. Sourcing aggregates locally is critical because hauling aggregates long distances or importing

from other states inordinately increases project costs, adds to wear and tear of public infrastructure, and contributes to elevated greenhouse gas emissions. The cost of all projects requiring aggregates increases with the increased distance from the source. Larger projects such as airport runways, road construction, schools, local streets, community centers, and medical facilities are typically impacted the most, increasing burden on local communities. It is therefore sound land use planning to allow the extraction of this available high-quality resource under the on-going authority of a local zoning/conditional use/mining permit. Construction aggregates are needed in a growing community because they are the basic key ingredient in concrete (making up 60-80% of a concrete mix), and asphalt (making up over 90% of asphalt mix), and are used in road and bridge construction, buildings such as hospitals, schools, homes, and businesses.

Holcim purchased the lands encompassing the eastern reserves in 1972 with the long-term plan of expanding the quarry once the limestone on their property west of CR 75 was exhausted. The expansion will provide for a continued supply of aggregates to be utilized in state, county, and local public improvement projects, as well as for private construction projects all within the existing service area. The Project will extend the local supply of construction aggregates supporting the construction and development activities in the surrounding communities for the next 20-25 years.

4.0 Project Alternatives

The EIS must evaluate and compare the potentially significant impacts of the proposed Project with a No Action Alternative and other reasonable alternatives. The Minnesota Environmental Review Rules require the EIS to address at least one alternative of each of the following types of alternatives or provide an explanation of why no alternative of a particular type is included in the EIS (Minnesota Rule 4410.2300, Item G.)

- No Action Alternative
- Alternative Sites
- Alternative Technologies
- Modified Designs or Layouts
- Modified Scale or Magnitude
- Alternatives incorporating reasonable mitigation measures identified through the EIS scoping and Draft EIS process.

An alternative may be excluded from analysis in the EIS if:

- It would not meet the underlying need for, or purpose of, the Project.
- It would likely not have any significant environmental benefit compared to the Project as proposed.
- Another alternative, of any type, that will be analyzed in the EIS would likely have similar environmental benefits but substantially less adverse economic, employment, or sociological impacts.

RGUs should not examine extraneous alternatives just to make an EIS more complicated (EQB, 2010).

4.1 Proposed Project

The proposed Project is to expand the existing quarry mine limits by 70 acres. The Project will require a reroute of CR 75 around the eastern perimeter of the mine limits. The proposer will be financially responsible for the construction of the road and will negotiate a long-term maintenance agreement with the jurisdictional road authority to cover maintenance costs...

4.2 No- Build Alternative

The EIS will include a No-Build Alternative. The No-Build Alternative assumes the Site will continue to be used for pastureland. The evaluation of a No-Build Alternative will describe potential impacts to the topics considered in the EIS if the proposed Project did not occur.

4.3 Alternative Sites

An Alternative Site analysis will be excluded from the alternatives studied in the EIS. The Project is an expansion of the existing Larson Quarry. The location of the expansion area is an integral part of the Project due to its unique geology, verified accessible aggregate resource, and its proximity to the existing operations area and loading infrastructure. Minnesota Rules (Minn. Rule 4410.2300 subp. G) and the Environmental Quality Board's (EQB) May 2010 Guide to Minnesota Environmental Review Rules produced by the Environmental Quality Board staff establish that an alternative that does not meet the underlying purpose for the Project can be excluded from the alternatives analysis. The guidance establishes that site access or ownership is a key criterion to consideration of an alternative site analysis. Holcim has owned the land within the expansion area since the 1970's, and does not own other undeveloped land within the target service area within close proximity to the existing operations area and load-out facilities. Holcim does not have access/ownership to mineral rights on other sites in the immediate area and does not have eminent domain authority, which would provide a means to obtain access rights. Therefore, the Site in and of itself is an integral part of this Project. Lastly, as indicated in the May 2010 EQB guidance, RGUs should not examine extraneous alternatives just to make an EIS more complicated.

4.4 Alternative Technologies

Relevant alternative technologies would involve wet mining techniques as opposed to the current operations which dewater the quarry to allow blasting and removal of the limestone under dry conditions. Wet mining technologies, such as a dredge or drag line, are not practical given the type of materials (consolidated bedrock) or the depths to which the target resource extends below the water table. Wet mining technologies are not a reasonable alternative that would meet the need or purpose of the Project and will not be considered in the EIS.

4.5 Modified Designs or Layouts/Modified Scale or Magnitude

A modified design alternative will be evaluated in the EIS which also results in a reduced scale. This alternative is referred to as the Bridge Alternative and involves the construction of a bridge and

underpass below County Road 75. The bridge and underpass would create an east-west connection at the existing quarry floor elevation beneath County Road 75. The underpass would provide access to the eastern reserves. The underpass would also allow transfer of extracted limestone from the eastern reserves beneath County Road 75 to the existing processing, stockpile, and loadout areas, without the need for an overland crossing on County Road 75. The Bridge Alternative would require a temporary relocation of County Road 75 and the utilities around the eastern portion of the construction area during construction of the bridge underpass. This option also includes temporarily relocating CR 75 to extract materials from the CR 75 ROW. After that extraction is complete, CR 75 would be rebuilt in its current location with the underpass.

The Bridge Alternative would reduce the scale and magnitude of the project by leaving the County Road 75 right of way and associated setback area (except for the underpass area) which contains limestone resource unmined and would reduce the scale and magnitude of the mining limits from 70 acres to 53 acres and result in less limestone resource ultimately mined and utilized from the expansion area resource. The Bridge Alternative will also reduce the area outside of the proposed mine limits that will be distributed as a result of relocating County Road 75 around the eastern perimeter of the expansion area. The EIS will include an evaluation of a modified-scale or magnitude by evaluating the potentially significant environmental effects associated with the Bridge Alternative.

4.6 Incorporation of Reasonable Mitigation Measures (Mitigation Alternative)

Reasonable mitigation measures will be identified and evaluated based on the results of the analysis for each topic of the EIS where potentially significant effects are identified. The identification of mitigation measures in the EIS will provide decision makers with information that may be incorporated into future permit documents.

5.0 EIS Topics With Potential Significant Effects:

When a positive declaration is adopted, the basis for the contents of an EIS is the record maintained of the EAW process, including specific findings of fact, supporting the decision. The County utilized the EAW, EAW public comments, response to comments, and public scoping meeting comments to identify those potentially significant issues relevant to the proposed project. Based on MN Rules 4410.1700, subpart 7 which provides the criteria for determining the potential for significant impact, the Washington County Board of Commissioners adopted findings of fact establishing that the Project does have the potential for significant environmental effects in the following two resource areas: 1. Cultural resources, specifically archaeology, and 2. Removal of significant vegetation stands with insufficient mitigation measures identified. This section of the SDD identifies the additional information to be gathered, studies to be conducted, and/or plans to be prepared, beyond what was included in the EAW, and the level of detail to be included in the EIS with respect to the evaluation of those topics specifically identified as having a potential for significant effects.

5.1 Cultural Resources

The EIS will include the following additional items to address potentially significant issues related to cultural resources.

1. The EIS will include an updated Phase 1 Archaeological Investigation of the Larson Quarry Expansion and County Road Realignment Project to address comments received during the EAW public comment period.
2. The Proposer will submit a Project Review Form to the Minnesota Indian Affairs Council (MIAC).
3. The EIS will include the results of a site review by MIAC to be conducted after snowmelt and frost is out of ground. It is anticipated that MIAC will perform testing as deemed necessary and make an official determination regarding the EIS study area.
4. The EIS will include information regarding Proposer contact with Tribal Historic Preservation Officers (THPO) from the list of Minnesota Tribes and all tribes listed in the tribal directory Assessment Tool (-TDAT-) for Washington County. The Proposer will provide these tribes with information describing the Project and where they can find additional information.
5. The EIS will include an Inadvertent Discoveries Plan to be implemented at the Larson Quarry.
6. The EIS will include proposed mitigation related to cultural resources as may be appropriate based on the additional information gathered, studies conducted, and/or plans prepared for the EIS.

5.2 Vegetation Stands

The EIS will include the following additional items to address potentially significant issues related to significant vegetation stands.

1. The EIS will include an evaluation of the existing site vegetation including native plant communities and significant existing vegetative stands (vegetation areas that serve as living remnants of the original native communities, but do not meet the size and quality criteria necessary to be classified as a Native Plant Community by the Minnesota Biological survey). Quantifying fragmentation of continuous habitats, the evaluation of the introduction of invasive species, and wildlife habitat will be included in this analysis.
2. The EIS will include an analysis of potential impacts to identified native plant communities, significant vegetation stands, and wildlife habitat for each alternative studied in the EIS, including the road realignment and construction impacts within the MRCCA. The use of fragmentation as a metric in evaluating reclamation outcomes will be included in this analysis.
3. The EIS will include proposed mitigation related to impacts to the significant vegetation stands and will include a vegetation restoration plan developed with consideration of priorities for natural vegetation restoration, erosion prevention, slope stabilization, and wildlife habitat.
4. The EIS will include a post mining revegetation plan that utilizes native vegetation.
5. The EIS will include an evaluation on the quality of habitat post mining, identification of anticipated final species and plant communities, and development of a vegetation management plan and performance standards to measure success and verify minimum standards have been achieved. Coordination with the DNR and National Park Service will be included in the EIS documentation.

6.0 Topics requiring updates to information presented in EAW

The EIS will include minor revisions or updates to certain sections of the EAW based on comments received during review and from the subsequent response to comments. The following topics were determined by the RGU to not meet the definition of significant impact but identified as needing updated or additional information to be presented in the EIS.

6.1 Project Description

The EIS will include the Project Description presented in the EAW, amended to include the following additional or updated information identified in the EAW comments and response to comments.

1. The project description will be updated to include information regarding the establishment of a littoral zone around the perimeter of the perimeter shoreline of the eastern expansion area.
2. The project description will be updated to clarify that the current hours of operation are permitted through an annual Town Board approval process. The description will also include information regarding hours of operation established by ordinance and operating permits.
3. The project description will be updated to include additional information regarding the jurisdictional status of County Road 75 and the assignment of responsible parties for future road maintenance costs in the event of a jurisdictional turnback.
4. The project description will be updated to provide additional clarity with respect to the review and approval process by the Township and County of the reclamation plan associated with the Project.
5. The project description will include additional detail of site access for each alternative and potential impacts to existing driveway easements located within the expansion area.

6.2 Climate Adaptation

1. The EIS will include an update to table presented in item 7b of the EAW to include “use of native vegetation in reclamation of upland areas” as an adaptation under Project Design as well as under the Land Use category.

6.3 Cover Types

1. The EIS will include an updated cover types table.

6.4 Permits

2. The EIS will include an updated Permits Table and will include necessary variance applications that may be required from the Township’s Ordinances specifically related to setbacks and planned mined activities within the setbacks.

6.5 Water Resources

1. The EIS will include information regarding existing PFAS groundwater contamination and existing PFSS and E. coli surface water contamination in the Mississippi River and Grey Cloud Channel as it relates to contaminant transport as a result of dewatering the eastern expansion area.

6.6 Transportation

1. The EIS will include additional detail regarding the quantity of truck hauling vs. barge hauling based on the past five-year truck counts that were provided in the response to comments.

7.0 New Data or Regulations

The EIS will include the incorporation of new data or new regulations that may be relevant to the topics considered in the EIS.

8.0 EIS Schedule (Tentative)

The timeline for the scoping period and EIS preparation will be in accordance with the time limits for preparation as set forth in Minn. R. 4410.0200 to 4410.6500. A preliminary schedule and list of activities for the completion of the EIS for the Project are outlined in the following tables. The Scoping Process schedule has been developed by the RGU, while the Draft and Final EIS schedules are based on the Draft EIS preparation schedule anticipated by the project proposer.

Table 8.1 Scoping Process

Planned Date	Event
May 13, 2025	Notice of public Scoping Meeting published in Monitor (w/in 15 business days of receipt of the proposers scoping cost payment)
May 28, 2025	Scoping Meeting (must be held between 10 business and 20 calendar days after notice appears in EQB monitor: i.e. second week after publication)
June 24, 2025	RGU makes final scoping decision within 15 business days after public scoping meeting or at the first regularly scheduled board meeting after scoping meeting.
July 2, 2025	EIS preparation notice published in EQB Monitor, RGU issues press release, 280-day EIS process begins

Table 8.2 Draft EIS

Planned Date	Event
September 2025	RGU distributes completed Draft EIS and publishes notice in EQB Monitor.
October r 2025	RGU holds informational meeting not less than 15 days after publication in <i>EQB Monitor</i>
November 2025	RGU publishes response to substantive comments on Draft EIS and prepares Final EIS

Table 8.3 Final EIS

Planned Date	Event
December 2026	Final EIS published in <i>EQB Monitor</i> /Final EIS distributed
January 2026	RGU makes determination of adequacy of the Final EIS (at least 10 days following publication)
February 2026	Adequacy decision notification and published in <i>EQB Monitor</i>