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Rapid City Growth
Management Department

To: The Rapid City Planning Commission,

Dear Commissioners,

In regards to the proposed $16.6 million TIF, I am asking that you please consider the following:

1. Can the proposed property be categorized as "blighted," as outlined below? I fail to see how three natural canyons meet the following description:

11-9-9 (Dilapidation, age, or obsolescence, inadequate provisions for ventilation, light, air, sanitation, or open spaces, high density of population and overcrowding, the existence of conditions which endanger life or property by fire and other causes or any combination of such factors and 11-9-11 (Any area which is predominantly open and which because of obsolete platting, diversity of ownership, deterioration of structures or of site improvements, or otherwise, substantially impairs or arrests the sound growth of a municipality, is a blighted area). Green noted the first two statutes are rarely used and while statute 11-9-11 contains vague criteria, the blight must be substantial.

2. "Alderman Bill Okrepkie recommended that the TIF be used to help the developers because of blight. At an August 3rd meeting, he moved to recommend approval of the Dakota Canyon Marketplace Tax Increment District with blight identified as the steep uneven terrain of the property and the soils and the subsurface. Okrepkie says, "I look at blighted, means it wouldn't be developed anyway and if you could develop, it would have been, but the market says it's un-developable. Because it's just too expensive. So, does that make it blighted? In my opinion, yes." (KEVN News)

My question is, if it's too expensive, why would we use TIF money to develop private property?

There are many businesses on Highway 16, built on smaller acreages then the one in question (without filling in the canyons). Okrepkie's claim that the land is "un-developable" is at the very least disputable. The development will just have to be more appropriately suited to the existing land. (Keep in mind the land was purchased with full knowledge of the existing canyons.) I don't feel this should cost the taxpayers of Rapid City. There is ample flat land suitable for this type of development available within a 2-3 mile radius of the proposed site. Therefore, if this is the desired area, there are alternatives that must be explored that in turn would create substantial savings for the taxpayer.

3. Is it prudent and responsible to allow such extreme alterations to natural canyons without studies done to examine the impact? Areas/issues that could be affected by this project include:

a. The wetland and natural springs contained within the canyon
b. Flooding caused by extreme watershed
c. The disturbance of existing class V shallow injection wells (disposal systems that are used to place a variety of fluids below the land surface) The fluids released by certain types of these wells have a high potential to contain elevated concentrations of contaminants that may endanger drinking water, according to EPA, http://www.epa.gov/safewater/uic/cv-fs. These wells are located on the Coleman/B.H. Gold Manufacturing Plant property directly across from the proposed site, where the developer is going to require significant blasting and earth removal just to prepare the site for building. This creates the potential of contamination to the existing water aquifers below.
d. Filling three natural canyons seems impractical and using TIF money in such an exaggerated way could cause legal repercussions to the city and set precedence for such extremes.

Commissioners, I strongly urge you to vote no against this application. I thank you for the time you give your community in service and your consideration of my letter.

Sincerely,

Daun Gagliano
1324 Panorama Circle
Rapid City SD
343-5016

Also, please note the attached Vulnerability Risk study with regard to blasting near the class V wells.

Vulnerability (Risk) Mapping of the Madison Aquifer near Rapid City, South Dakota

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ABSTRACT

Water supplies for Rapid City, South Dakota, and surrounding suburban and rural areas are extremely vulnerable to contamination. The impact of ground-water contamination could occur quickly and linger for many years. The City of Rapid City is located within the Rapid Creek watershed in the east-central BlackHills and relies heavily on the Mississippian Madison karst aquifer for drinking-water supplies, utilizing several wells and springs. The aquifer consists of limestone and dolomite and contains paleo karst and recent karst that probably formed along a well-developed fracture system. Previous work indicates stream-related aquifer recharge from the watersheds of Spring Creek (to the south), Boxelder Creek (to the north), and Rapid Creek as well as direct recharge by precipitation on the entire outcrop area west of Rapid City. Spring
Creek and Boxelder Creek lose all their flow to karst sinkholes in the aquifer except during periods of high discharge (greater than approximately 28 ft3/sec for Spring Creek and 50 ft3/sec for Boxelder Creek.Ground water from these watersheds converges on wells and springs in the Rapid City area several miles away. Dye-tracer tests for this area indicate ground-water velocities on the order of 1,000 feet per day and residence times range from a few days to several years.

A database of 329 wells, geologic maps, fractures, faults, geologic structures, water-quality data, and dye-tracer test results were analyzed to develop a geologic model to better define local ground-water flow paths and characterize susceptibility zones. Structure contour and depth-to-aquifer maps have been completed for the Madison aquifer. Inherent aquifer susceptibility, combined with human influences, was used to develop a vulnerability (risk) map (1:24,000 scale) for the Madison aquifer for the Rapid City area.

http://pubs.usgs.gov/sir/2005/5160/PDF/sir2005-5160part4.pdf