

January 17, 2022

To:

F. David Radford, Deputy State Director of Geospatial Services
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Dear Mr. Radford,

As a lifelong resident of Ely, MN, born above my Grandparents grocery store in 1948, I was raised here, went to school here, and lived here ever since my 4-year tour of active duty in the US Air Force from 1966–1970.

As a part of Ely for 70+ years (not counting my 4 years in the USAF) has been to promote our natural resources, this City of Ely, the Ely Area, and the Iron Range. I have done this as a lifelong Volunteer in local Ely Community and area organizations as well as being elected to serve on the Ely School Board.

So, some history. This town was a really bustling, vibrant community when I was growing up, nearly double the current population of 3200, when I graduated in a class of 128 students in 1966. (My granddaughter's class (Class of 2026, only has 43 students today, with just a little over 500 students currently enrolled in the school district.)

The Ely schools had around 1775 students in K-12 in those years around and following my graduation. There were 5 major school buildings on the local campuses as well as Ely Junior College, now Vermilion Community College.

Ely had 9 grocery stores, 5 car dealerships, 10 gas stations, 6 women's clothing stores, 5 men's clothing stores, 5 hardware stores, 2 large theatres, 2 lumber yards, a huge Community Center, 3 large hotels, and 8 motels in town, about 2 dozen bars and liquor stores, 2 machine shops, a railroad and depot, about a dozen restaurants, a Greyhound bus station, 2 sawmills in the area, and many outfitters as well as around 40 resorts in the Boundary Waters in the Ely area. Not so anymore!!

I've Canoeed, Boated, Fished, Hunted, Camped (Summer and Winter), Snowmobiled, and Skied in and around the BWCA with my family, my friends, our scout troop, and our snowmobile club in my nearly 74 years in our Ely area. Taught youth the proper ethics of and before Leave No Trace in our Scout Troop, Firearms, and snowmobile safety classes and practiced it when we've done these activities!

Dorothy Molter (of Knife Lake fame) and her sister, Ruth, were friends of mine. Laurel and Gladys Bennett of Canadian Border Outfitters, Benny Ambrose up on Ottertrack Lake, Bill and Dorothy Powell who had a resort on Saganaga, Don and Opal Ensenhauer at Voyageur's End of the Trail Resort (Gunflint) also on Saganaga were also friends and acquaintances of mine. As well as Vince and Char Ekroot at Windigo Lodge on Poplar Lake on the Gunflint Trail.

These were people we visited regularly years ago, in the good old days, before the W was added to the BWCA!

I've fished and camped on many BWCA lakes. I know the importance of clean water and what we have here. We've eaten the fish we caught and drank the water they came from without filtering it! And we also know enough to not drink the water by beaver dams!

Ely used to thrive with its 3-legged economic stool of Mining, Logging, and Tourism to support its citizen's livelihoods and recreation, as well as being the Playground of a Nation for people from around the area, the country, and the world. Heck, even Ted Williams, the Baseball Hall of Famer, field tested hunting and Shakespeare fishing equipment here at Basswood Lodge because of our outdoor resources!

After the Air Force, I worked for nearly 34 years, driving and car-pooling from Ely to U.S. Steel's Minntac mine and plant in Mt. Iron, as an Instrumentation, Electronics and Electrical Systems Repairman specializing in Plant Process Control Systems.

As a 3rd generation miner, I earned a darn good living in that Union job with very good pay and benefits to now be retired comfortably and to continue to support this town.

My career working in the process control systems in the mining industry gave me a lot of insights into the calibration and control of crushers, feeders, scales, flowmeters, pressure and differential pressure equipment, radiation, kiln temperatures, percent of solids analyzing equipment, flotation, water turbidity, flocculants, power usage, closed circuit TV systems, photo-eyes, position and limit switches and sensors, and many other types of systems to regulate and control process equipment to specific parameters to meet and/or exceed quality standards.

Those of us who have lived here all our lives, want to make sure any Non-Ferrous operation, or any industry can, and will maintain the highest environmental standards to keep our water and our air clean for us and future generations.

So, I believe, the Twin Metals Minnesota mine, and its proposed plan of operation is based on being comprehensive, with a science and fact-based environmental review process for its proposed underground copper, nickel, cobalt and platinum group metals mining project that has been underway since the company submitted its mine plan of operations in November of 2019.

That continuing regulatory process, including the EIS, requires years of detailed review of TMM's operational plans and the potential impacts under multiple federal, tribal, and state government entities, as well as opportunities for public comment.

Since the project was first conceived, the focus has been on reducing the footprint and potential environmental impact. The daily production rate has been reduced from 50,000 tons to 20,000 tons per day.

Most significantly, the company now plans to manage the tailings by utilizing a safer, more environmentally stable dry stack tailings method, thereby eliminating the need for a slurry pipeline, thus significantly reducing the surface footprint of the project.

Additional features and details regarding the project include the following:

- The mine will not discharge process water and is designed to not discharge contact water.
- The mine will be underground, not an open pit mine. The project footprint is only 15-20% of that of an open pit mine.
- Utilizing dry stack tailings management eliminates the need for tailing ponds or dams, thus eliminating the risk of a dam failure. Utilizing the dry stack tailings management method reduces the surface impact by approximately 35% and the wetlands impact by approximately 65%, compared to slurry tailings storage.
- Approximately one-half of the tailings will be stored at the dry stack facility; the remainder will be placed as cemented backfill in the underground mine. The dry stack facility will be lined and reclaimed with soil and vegetation.
- There will be no subsidence at the mine site due to backfilling and underground stabilization through post and pillar placement within the mining stopes.
- Mining will occur between 400 feet and 4,500 feet underground. No mining will occur under the Birch Lake reservoir. The ore crushing operation will be underground, thus reducing noise.
- Mining vehicles will be electric, greatly reducing onsite greenhouse gas emissions and will result in improved worker safety by eliminating vehicle diesel exhaust.
- The potential for acid rock drainage has been eliminated.
- Most of the mine's infrastructure will be removed in the mineland reclamation process, and the surface area will be revegetated after the closure of the mine.

With the current and future needs for Copper, Nickel, Cobalt, Platinum, and other PGM minerals for the growing Green Energy sector of the U.S. economy and to end our reliance on foreign countries for these products, we must do this here!

We have the mineral resources here, and we need to environmentally mine and source these minerals right here in the Ely area.

It will revitalize our local economy and supply critical Green Energy metals as well as contributing to and enhancing our National Defense and Strategic Metals sourcing.

I speak from my career and experience as a 34-year Process Control Instrumentation, Electronics, and Electrical Repairman, as to how to analyze, calibrate, and use control systems to regulate and ensure the most efficient process while protecting the environment and worker safety throughout the process.

(As a side note, It also appears to me, that this "Withdrawal" looks more like a backdoor attempt to enlarge the BWCAW at some point and restrict more of what can be done in our area outside the current BWCAW Boundaries.)

Therefore, I very strongly oppose the BLM and Forest Service withdrawing the 225,000 plus acres of Federal Lands from new or continuing Mineral Leases for 20 years, or any term, near the Boundary Waters Canoe Area Wilderness (BWCAW).

And I strongly oppose the 2-year segregation that prohibits the issuance of new or continuing Federal Mineral prospecting permits or lease applications in the withdrawal area.

We already have strong EIS and regulatory review processes to effectively protect the environment, including the BWCAW and Rainy River Watershed.

Thank You for the opportunity to comment.

Sincerely,



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