

January 17, 2022

To:

F. David Radford, Deputy State Director of Geospatial Services

BLM Eastern States Office

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Falls Church, Virginia 22041

[BLM ES Lands@blm.gov](mailto:BLM_ES_Lands@blm.gov)

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Dear Mr. Radford,

The current non-ferrous mining rules in Minnesota are designed to protect our environment and ensure that any new proposed mining project meets the stringent standards in place before it can be permitted.

The comprehensive, science and fact-based environmental review process for the Twin Metals Minnesota (TMM) proposed underground copper, nickel, cobalt and platinum group metals mining project has been underway since the company submitted its mine plan of operations in November 2019. That regulatory process 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 the 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.
- Mining will occur between 400 feet and 4,500 feet underground. No mining will occur under the Birch Lake reservoir. The ore will be crushed underground, thus reducing noise.
- Mining vehicles will be electric, greatly reducing onsite greenhouse gas emissions and will result in improved worker safety by eliminating diesel exhaust.

- There will be no subsidence at the mine site due to backfilling and underground stabilization through post and pillar placement within the stopes.
- The potential for acid rock drainage has been eliminated.
- Most of the mine's infrastructure will be removed in the mineand reclamation process, and the surface area will be revegetated after the closure of the mine.

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.

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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