

January 18, 2022

To:

F. David Radford, Deputy State Director of Geospatial Services

BLM Eastern States Office

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Dear Mr. Radford,

Let me start off again, as a lifelong resident of Ely, MN, born above my Grandparents grocery store in 1948, I was raised here, graduated from school here, and lived here ever since my Honorable Discharge from my 4-year tour of active duty in the US Air Force from 1966–1970.

As a Veteran, a Union Member, and 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.

Some of Ely's 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 Senior class of 128 students in 1966. (My granddaughter's class (Class of 2026, only has 43 Seniors today, with just a little over 500 students currently enrolled in the school district.) One-Third the size of my class!!

The Ely schools had around 1,775 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. Currently, the Ely School District only has a little over 500 students.

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!!

Today, we have 1 grocery store, 0 car dealerships, 5 gas stations, 1 sort of women's clothing stores, 1 sort of men's clothing stores, 2 hardware stores, finally 1 renovated theatre, 1 lumber yard, 0 Community Centers, 1 large hotel, 6 motels, 5 bars and liquor stores, 1 machine shop, 0 railroads and 0 depots, 4 sit down restaurants, 2-3 pick up restaurants, 0 bus depots, 0 sawmills, 1 dollar store, and 3 outfitters in town! Resorts...maybe a few!

There is barely anything open anymore after 10:00 o'clock at night! When I was working 3-11 shift and got home from work around midnight, you could hardly find a place to park in the downtown area on

Sheridan and Chapman Streets and on Central, 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> Avenues. You could go to any restaurant or bar until closing and stay out at restaurants most nights until 2:00-4:00 in the morning!

Now, you can shoot a canon down the main street at 9:00 – 10:00 at night and Not hit Anything!!

Ely's economy sucks and is down the drain!! No question about it!!

Am I upset? Yes! The rhetoric to kill any mining or industry here is getting sickening to most of us that were born and raised here.

Tourism is NOT making this town survive!! Nor does it pay a Living Wage with Benefits to the majority of their workforce.

The false statements from and by the Friends of the Boundary Waters, Save the Boundary Waters, Northeastern Minnesotans for Wilderness, etc. are destroying this town!! There is not much left!!

I've lost my 2 sons! One committed suicide mostly because he couldn't make it working three (3) service industry and restaurant jobs in this town!! Our granddaughter lost her father!!

The other one moved away....to South Dakota!! He was planning on buying into a Restaurant, but business was downhill, and because he said there is not a future here!

What do we have left? Most of our kids that graduate from Ely HS, move away, because there's not a damn thing left for them here anymore!

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.

Those of us who have lived here all our lives, want more industry, mining, and jobs, but we also 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 science and a sound, fact-based environmental review process for its proposed underground copper, nickel, cobalt and platinum group metals mining project that has been underway since around 2010 and since the company submitted its mine plan of operations in November of 2019.

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

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

It will revitalize our local economy and supply critical Green Energy metals, just like the Biden Administration has stressed so often sourcing these minerals from the United States, NOT some foreign country that has none to few Environmental or Labor laws.

It will enhance 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. Each project should stand on its Own Merits!

Thank You for the opportunity to comment.

Sincerely,



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The University of Minnesota – Duluth, NRRI (UMD - Natural Resources Research Institute) did a study on the Copper – Nickel deposits in the Duluth Complex in NE Minnesota and found it to be generally Negative for Acid Potential. The State of MN did a legislative study also in the 1970's, I believe, with similar results, under Governor Anderson.

As Chairman of the MN Highway 169 North Task Force, in conjunction, with MN Department of Transportation, Dist. #1, and MN DOT State Headquarters, we did a study on the Sulfide rock in the Eagles Nest Area Reconstruction Project, SP 6904-46 and what we found and used as mitigation measures.

The BLM and U.S. Forest Service should have been working with these people and organizations during the past 50 years that they have known about these mineral deposits and the potential economic development projects. Where have you been?

Since the project was first conceived, following in the footsteps of Newmont Mining, Inco – the International Nickel Co, AMAX, and other CuNi companies since the 1950's to now, Twin Metals focus has been on reducing the footprint and potential environmental impact.

Most significantly, the company now plans to manage the tailings by utilizing a safer, more environmentally stable dry stack tailings method, 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 daily production rate has been reduced from 50,000 tons to 20,000 tons per day.
- The mine will be underground, not open pit. The footprint is 15-20% of that of an open pit mine.
- 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.
- Utilizing Dry Stack tailings management eliminates tailing ponds or dams, eliminating the risk of a dam failure. Dry Stack reduces the surface impact by approx. 35%, wetlands impact by approx. 65%.
- Approximately one-half of the tailings will be stored at the dry stack facility; the rest will be placed as cemented backfill in the underground mine. The dry stack facility will be lined and reclaimed.
- 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 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!