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January 13, 2022

Deb Haaland
Secretary
Department of Interior
1849 C Street N.W.
Washington, D.C 20240

F. David Radford, Deputy State Director of Geospatial Services
BLM Eastern States Office
Ref: Superior National Forest Withdrawal Application
5275 Leesburg Pike
Falls Church, Virginia 22041

Re: Superior National Forest Withdrawal Application

Dear Secretary Haaland & Mr. Radford:

I am a military veteran and I write to you to express my opposition to the proposal by the Biden Administration to withdraw 225,000 acres from mining activity on federal lands in the Rainy River Watershed for 20 years.

I enlisted in the Marine Corps upon graduation from a high school in Wisconsin. I was honorably discharged in 1958 and I enrolled in college later that year.

I intended to obtain a degree in forestry and began my studies at the University of Wisconsin/Stevens Point. Unfortunately, no such coursework was available at that time and I moved on to the University of Wisconsin/River Falls and then on to the University of Wisconsin/Madison, where I was awarded a Bachelor of Science Degree from the School of Agriculture in 1962.

I entered law school while I was employed by a Minneapolis real estate developer, attending classes at night for four years. In 1967 I was awarded a Juris Doctor Degree from William Mitchell College of Law, St. Paul, Minnesota. After a long business career involving real estate development and life and health insurance, I moved to Ely 20 years ago, to retire.

Opposition to copper-nickel mining, and Twin Metals Minnesota's proposed copper-nickel mine in the Rainy River Watershed, has been led by three Minnesota based anti-mining organizations whose arguments and assertions in opposition to the TMM mine are based on

neither the science nor the facts. Modern mining can be done safely, for both the workforce and the environment.

Since TMM's project was first considered, 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 nor 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. 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 pillar placement within the stopes.
- The potential for acid rock drainage has been eliminated.
- Most of the mines infrastructure will be removed, and the surface area will be revegetated after the closure of the mine.

The modern mining techniques employed by today's mining companies ensure that copper-nickel mining can be safely conducted in the Rainy River Watershed with a minimum of risk to the BWCAW.

Sincerely Yours,



Gerald M. Tyler