

January 18, 2022

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

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EASTERN STATES OFFICE
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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:

My name is David W. Johnson. I am a senior citizen and fourth generation Elyite. I worked as a miner for Reserve Mining and Inland Steel and retired after 32 years of service.

I write to express my vehement opposition to the Biden Administration's proposal to withdraw Forest Service lands from disposition under the U. S. mineral and geothermal leasing laws and impose a moratorium on mining activity for 20 years.

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. The three anti-mining organizations include Northeastern Minnesotan's for Wilderness (NMW), Minnesota Center for Environmental Advocacy and Friends of the Boundary Waters Wilderness. These organizations have seriously damaged our local economy and its business community with their actions and arguments that claim that Ely can prosper with tourism alone driving the economy. Tourism never has, isn't now and never will be, the driving force behind our local economy.

Consider these facts. Our business community, its economy and its population has been in a steady decline since the closure of the last iron ore mine in 1967. In 2019 Minnesota's median family was \$71,306 while Ely's median household income was much less, only \$40,946, well behind the State as a whole. Our community owned hospital does not even have a birthing center to serve young families living here.

In 1967, K-12 enrollment in the Ely School District was 1775. I graduated from Ely High School in 1968 with a class of 124. Presently, only 29 seniors are expected to graduate in 2022. Five grocery stores were then open to serve the public and Ely's 5,400 residents. At this time, only one grocery store remains open to serve Ely's 3,200 residents and the surrounding area.

Twin Metals has spent more than \$550 million dollars planning its mining project. When permits have been obtained it will spend another \$1.7 billion dollars to construct the mine. 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; and they can provide a supply of badly needed minerals for our generation and those to follow.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "David W. Johnson". The signature is fluid and cursive, with a long horizontal stroke at the end.

David W. Johnson
106 East Fortier Street
Ely, MN 55731