

# MINNESOTA CHAMBER of COMMERCE

March 19, 2007

Scott Ek, Principal Planner  
Environmental Policy Review  
Department of Natural Resources  
Division of Ecological Services  
500 Lafayette Road, Box 25  
St. Paul, MN 55155-4025

Dear Mr. Ek:

**RE: Draft Environmental Impact Statement, Minnesota Steel Project**

This is a response to your request for comments on the draft Environmental Impact Statement (EIS) for the Minnesota Steel iron mining, processing and steelmaking facility in Nashwauk.

We support finalization of the EIS. We commend the Department of Natural Resources and all of the state and federal agencies who have cooperated on the development of the EIS. With the finalization of this document, this important project can move forward to permitting and the beginning of construction.

Without a doubt, the Minnesota Steel project is one of the most impressive economic development projects in Minnesota history. The \$1.6 billion project will provide 2,000 construction jobs, 700 full-time jobs and 2,100 spin-off jobs. The annual economic impact will be over \$600 million. Each year the state and local governments will receive approximately \$18 million in taxes and royalties.

We know that Minnesota Steel is committed to protecting our environment as they develop our important iron ore resource. The company will meet or exceed all of the environmental regulations. No variances have been requested. In addition, the state-of-the-art steelmaking process will use 30% less energy than traditional steelmaking.

We urge you and the other permitting agencies to work together on the issuance of permits that will allow the project to move forward.

Thank you for the opportunity to comment.

Sincerely,

David Olson  
President

cc: Governor Timothy Pawlenty  
Commissioner Mark Holsten  
Commissioner Brad Moore

400 ROBERT STREET NORTH, SUITE 1500, ST. PAUL, MN 55101  
T: 651/292-4650 800/821-2230 F: 651/292-4656 WWW.MNCHAMBER.COM

Comment Letters received from  
**Individuals**

## PUBLIC COMMENT HEARING ON MINNESOTA IRON &amp; STEEL'S EIS

MARCH 14<sup>TH</sup>, 2007

NASHWAUK HIGH SCHOOL

Re: RECREATIONAL TRAILS/LAND ACCESSIBILITY

I REALIZE THE ECONOMIC IMPORTANCE OF THIS PROJECT TO THE IRON RANGE, AND I AM VERY MUCH IN FAVOR OF THIS PROJECT GOING THROUGH. HOWEVER, I DO HAVE MAJOR CONCERNS DEALING WITH RECREATION IN THIS AREA.

THIS PROJECT IS GOING TO VIRTUALLY LAND-LOCK NASHWAUK AND SURROUNDING AREAS FROM THE EXISTING SNOWMOBILE AND ATV TRAILS. THIS PROJECT IS REMOVING ONE AND A HALF MILES OF THE ALBORN TRAIL WHICH IS A GRANT-IN-AID TRAIL MAINTAINED BY THE RANGE RIDERS ATV CLUB OF NASHWAUK. IT IS ALSO THE MAJOR CONNECTING TRAIL FOR THE SNOWMOBILE ENTHUSIASTS. I FEEL THAT MIS SHOULD BE A "GOOD NEIGHBOR" AND FIND A SOLUTION TO THIS PROBLEM. THEY ARE TAKING IT AWAY, THEY SHOULD WORK WITH THE LOCALS AND FIND AN ALTERNATE RE-ROUTE.

MY COUNTY COMMISSIONER AND MY STATE REPRESENTATIVE ARE OUTDOOR ENTHUSIASTS! THEY WOULD BE WILLING TO HELP.

Marilayne Bailey

400 N. 6<sup>th</sup> St.

Keewatin, MN, 55753

**From:** A1 <hardyliving@yahoo.com>  
**To:** <environmental.review@dnr.state.mn.us>  
**Date:** 2/9/2007 12:42 AM  
**Subject:** Minnesota Steel

To Whom It Concerns:  
From John Vernon

Please let me know if the Minnesota Steel project will lower or otherwise affect the water level in Sucker Lake (Big).

I also want to know how the steel project will affect the water quality in any other way.

I have a cabin on Sucker Lake, 18984 Sucker Lake road, and we want to know what to expect.

Our mailing address is 4440 31st Avenue S., Mpls, MN 55406

Thank you in advance.

---

Do you Yahoo!?  
Everyone is raving about the all-new Yahoo! Mail beta.  
<http://new.mail.yahoo.com>

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2

**Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers**

**Draft EIS Comment Form  
Minnesota Steel Project**

Name: Shawne Wright  
 Address: 31360 Rocky Shores Ln  
 City: Pengilly State: MN ZIP: 55775

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007**:

We are concerned about our personal property values going down. We live on the SW shore of Snowball Lake & with a mine pit coming within 1000 feet of lake we don't know that we'll be able to sell

1

Signature:  Date: 3-14-07

Scott Ek  
 Minnesota Department of Natural Resources  
 Environmental Policy and Review  
 500 Lafayette Road, Box 25  
 Saint Paul, MN 55155-4025  
[Environmental.Review@dnr.state.mn.us](mailto:Environmental.Review@dnr.state.mn.us)

Jon K. Ahlness  
 Regulatory Branch, St. Paul District  
 U.S. Army Corps of Engineers  
 190 Fifth Street East, Suite 401  
 St. Paul, MN 55101-1638  
[jon.k.ahlness@mvp02.usace.army.mil](mailto:jon.k.ahlness@mvp02.usace.army.mil)

**Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers**

**Draft EIS Comment Form  
Minnesota Steel Project**

Name: Chris Wright  
 Address: 31360 Rocky Shores LN  
 City: Engilly State: MN ZIP: 55775

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007**:

Im concerned about my well at my home when they  
 start mining dit 6. I dont want it to go  
 dry or taste funny.  
 Also. Dist when blasting or mining.

Signature:  Date: 3-14-07

Scott Ek  
 Minnesota Department of Natural Resources  
 Environmental Policy and Review  
 500 Lafayette Road, Box 25  
 Saint Paul, MN 55155-4025  
[Environmental.Review@dnr.state.mn.us](mailto:Environmental.Review@dnr.state.mn.us)

Jon K. Ahlness  
 Regulatory Branch, St. Paul District  
 U.S. Army Corps of Engineers  
 190 Fifth Street East, Suite 401  
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[jon.k.ahlness@mvp02.usace.army.mil](mailto:jon.k.ahlness@mvp02.usace.army.mil)

Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers

I-5

Draft EIS Comment Form  
Minnesota Steel Project

Name: CRAIG NELSON  
Address: 31715 SPRUCE DR.  
City: PENGUIN State: MN ZIP: 55775

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007**:

QUESTION ON BLASTING:

I PURCHASED THE PROPERTY I LIVE AT IN 1992. PRIOR TO THAT, THE PROPERTY WAS OWNED BY BUTLER TAC, AND WAS CONSIDERED INSIDE PIT #5 "BLAST ZONE." MINNESOTA STEEL PROPOSES TO RE-OPEN AND EXPAND PIT #5. HOW IS IT POSSIBLE THAT MY PROPERTY IS NOT CONSIDERED "BLAST ZONE" WHEN WHILE THE PREVIOUS MINE WAS IN OPERATION IT WAS? THE PROPOSED PLAN CALLS FOR EXPANSION OF PIT #5 CAUSING ME TO BELIEVE THE "BLAST ZONE" SHOULD BE LARGER NOW, THAN IT WAS DURING THE PREVIOUS MINING OPERATION.

WHAT IS MY RECOURSE, AND WHAT ARE MY RIGHTS WHEN THE STRUCTURE ON MY PROPERTY ARE DAMAGED DUE TO VIBRATION.

WILL THE MINE PAY FOR ALL REPAIRS TO MY HOUSE IN FULL, IMMEDIATELY FOLLOWING THEIR DISCOVERY?

Signature: Craig Nelson Date: 3-16-07

Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers

Draft EIS Comment Form  
Minnesota Steel Project

Name: CRAG NELSON  
Address: 31715 SPRUCE DR.  
City: PENGILLY State: MN ZIP: 55775

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007**:

QUESTION ON AIR QUALITY AND FUGITIVE AIR:

I LIVE LESS THAN 1 MILE SOUTH OF PROPOSED PIT #5. IT IS PROPOSED THAT MINE #5 WILL BE EXPANDED TO THE SOUTH AND THE WEST, BRINGING MY HOME CLOSER TO THE IMPAIRED AIR AND DUST. W

WHAT LOCAL GOVERNING AGENCY WILL MONITOR THE AIR QUALITY AND DUST LEVELS NEAR MY RESIDENCE.

WHAT IS THE CONTACT INFORMATION FOR THIS AGENCY.

Signature: Craig Nelson Date: 3-16-07



Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers

Draft EIS Comment Form  
Minnesota Steel Project

Name: CRAIG NELSON

Address: 31715 SPRUCE DR

City: PENNINGTON State: MN ZIP: 55775

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007**:

QUESTION ON PRIVATE WELLS:

WHEN THE PROPOSED PIT #5 IS DEWATERED, THE GROUND WATER TABLE IN SURROUNDING AREAS WILL DROP. MY WELL IS CURRENTLY 92' DEEP.

WHAT IS MY RECOURSE, AND WHAT ARE MY RIGHTS WHEN MY WELL GOES DRY IMMEDIATELY FOLLOWING, OR SHORTLY AFTER PIT # 5 IS DEWATERED?

WILL THE MINE PAY FOR A NEW WELL IN FULL, IMMEDIATELY FOLLOWING THE "DRYING UP" OF MINE.

1

Signature: Craig Nelson Date: 3-16-07

Scott Ek  
Minnesota Department of Natural Resources  
Environmental Policy and Review  
500 Lafayette Road, Box 25  
Saint Paul, MN 55155-4025  
[Environmental.Review@dnr.state.mn.us](mailto:Environmental.Review@dnr.state.mn.us)

Jon K. Ahlness  
Regulatory Branch, St. Paul District  
U.S. Army Corps of Engineers  
190 Fifth Street East, Suite 401  
St. Paul, MN 55101-1638  
[jon.k.ahlness@mvp02.usace.army.mil](mailto:jon.k.ahlness@mvp02.usace.army.mil)

**From:** Environmental Review  
**To:** Ek, Scott  
**Date:** 3/22/2007 10:22 AM  
**Subject:** Fwd: Minnesota Steel Draft EIS

>>> "Benepe, Lou" <[Lou.Benepe@amec.com](mailto:Lou.Benepe@amec.com)> 3/20/2007 10:08 AM >>>

I attended the public informational meeting on the above draft EIS held in Nashwauk on 3-14-07. I was impressed by the effort put forth by the DNR and other agencies to inform the public and to be able to respond to their questions.

I wish to express my support in general for the MSI project, having lived in the Swan lake area for over 30 years, and having spent an entire career in the iron ore industry. I am well aware that iron mining and a good standard of living can co-exist with recreational areas.

One concern I would voice is to try to accommodate as much public use of the former minelands as can be achieved, given the need to deny public trespass on mine lands, and with due regard to PM-10 emissions modeling. I speak particularly of the Alborn recreational trail, and of Blue Lake, both of which are actually creations of the Agency following the closure of Butler Taconite. Both are much used by the public, and could potentially be closed to future public use under the Minnesota Steel plan as now mapped.

The boundaries of the Permit To Mine Area, as exhibited during the informational meeting, appear to absorb the entirety of the O'Brien Creek flowage on the SW side of the proposed base case tailings pond (former Butler basin.) This peculiarity was explained as a convenient means of controlling the waterway, which eventually would require damming as the new basin develops. It is currently the overflow from Blue Lake, whose waters depend in large part on what pit pumping is done at KeeTac. This property line excursion cuts off any hope of the Alborn trail being revised in the area now in the Permit to Mine boundary. It is hoped that the agency can prevail on the permit applicant to either grant a corridor for the Alborn to continue to be used, or to eliminate the bulge in the property line which prohibits the Alborn from being shifted.

I look forward to the final EIS issuance and a favorable Record of Decision to allow the project to go ahead. It is the future of the Range, and its time is now.

Regards,

Lou Benepe  
 28654 Grozy's Pt. Rd.  
 Pengilly MN 55775

Retired Mining Industry engineer  
 Cleveland-Cliffs

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March 14, 2007-9

Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers

Draft EIS Comment Form  
Minnesota Steel Project

Name: Maria Kanth (218 885 2489)  
Address: PO Box 142  
City: Nashwan State: MN ZIP: 55169

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007:**

I live on the east side of Big Suher Lake 1.5 miles from the proposed project. I am concerned about the closing of county #58 and also concerned about the potential negative pollution impacts upon the area I live in.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Scott Ek  
Minnesota Department of Natural Resources  
Environmental Policy and Review  
500 Lafayette Road, Box 25  
Saint Paul, MN 55155-4025  
[Environmental.Review@dnr.state.mn.us](mailto:Environmental.Review@dnr.state.mn.us)

Jon K. Ahlness  
Regulatory Branch, St. Paul District  
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190 Fifth Street East, Suite 401  
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March 14, 2007-9

Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers

Draft EIS Comment Form  
Minnesota Steel Project

Name: Maria Kanth (218 885 2489)  
Address: PO Box 142  
City: Nashwan State: MN ZIP: 55169

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007:**

I live on the east side  
of Big Sugar Lake 1.5 miles  
from the proposed project.  
I am concerned about the  
closing of county #58 and  
also concerned about  
the potential negative  
pollution impacts upon  
the area I live in.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Scott Ek  
Minnesota Department of Natural Resources  
Environmental Policy and Review  
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Saint Paul, MN 55155-4025  
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Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers

Draft EIS Comment Form  
Minnesota Steel Project

Name:

Maria Kautto

Address:

PO Box 142

City:

Nashwan

State:

MN

ZIP:

55769

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007**:

Fold

Have you considered  
how 'global warming' would  
impact upon this area  
if this project comes to  
completion?

1

Fold

Signature:

Maria Kautto

Date:

March 15, 2007

Scott Ek  
Minnesota Department of Natural Resources  
Environmental Policy and Review  
500 Lafayette Road, Box 25  
Saint Paul, MN 55155-4025  
[Environmental.Review@dnr.state.mn.us](mailto:Environmental.Review@dnr.state.mn.us)

Jon K. Ahlness  
Regulatory Branch, St. Paul District  
U.S. Army Corps of Engineers  
190 Fifth Street East, Suite 401  
St. Paul, MN 55101-1638  
[jon.k.ahlness@mvp02.usace.army.mil](mailto:jon.k.ahlness@mvp02.usace.army.mil)

Mr. Scott Ek, Principle Planner  
 Environmental Policy & Review  
 Minnesota Department of Natural Resources  
 Division of Ecological Services  
 500 Lafayette Road, Box 25  
 St. Paul, MN 55155-4025

**RE: Comments for Minnesota Steel Industries, LLC Draft Environmental Impact Statement**

Dear Mr. Ek,

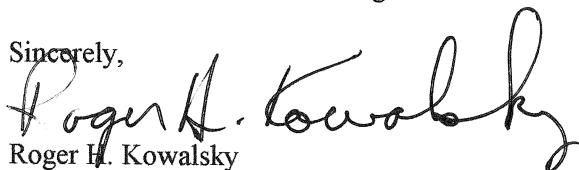
Please see the attached comments below but after reviewing the EIS it is clear that the proposed project will greatly reduce the property value of residents living on Little McCarthy Lake. On a typical day at Little McCarthy Lake a resident can sit in their yard and enjoy the sounds of nature. Birds and loons can be heard by day and the howling of wolves is very clear at night. Today when fishing on Little McCarthy Lake, the only disturbance is the occasional loon that comes to investigate what you are doing. Residents enjoy fishing, swimming, and water skiing on this pristine little lake. This will be changed forever once this project is operational.

In the past when Butler was operating, homes would shake with every blast in the pit at 7AM and 3PM. Trucks, bulldozers and trains could be heard on a daily basis. A fresh snowfall would only last one day before the dust and smoke would discolor it. The proposed project boundary will be much closer to Little McCarthy Lake residents than Butler ever was so the impacts will only be worse. The vehicle traffic for this project will be much worse since the entrance road will be either just South of the Lake or directly to the West of it. On top of the vehicle noise, the snowmobile trail will be rerouted directly to the East of the Lake adding to the noise.

Since the project will impact the watershed feeding Little McCarthy Lake, this will have a devastating impact on the water quality. Little McCarthy Lake is in a valley with very little wind and wave action to cleanse the lake. The lake will become very stagnant if the water flow to the lake is restricted. Plant and fish impacts are inevitable.

In summary, the proposed project will change day to day life on Little McCarthy Lake permanently. The lake will be impacted, the noise will increase, and the air quality will decrease. Residents should not have to loose substantial amounts of money on their property due to the proposed project. I hope that the DNR will consider all of these impacts on the local people who will have to deal with this on an everyday basis. The project is not fair for everyone. It will have an adverse impact on the wildlife in the area, the fish in the lake and to our children who live in the Twin Cities and enjoy a peaceful retreat and come home to Little McCarthy Lake. The company should be a responsible neighbor and offer relocation packages at fair market value to residents willing to move that live on the boundary.

Sincerely,



Roger H. Kowalsky  
 17858 Little McCarthy Lake Road,  
 Nashwauk, MN 55759  
 (218) 885-2383

**Page EX-14**

Section 4.3 discusses mitigation strategies for several lakes that will be impacted by the project. Little McCarthy Lake needs to be included in this review due to the impacts listed in the EIS and is discussed further below.

**Section 3.1.4**

The water management section addresses dewatering to several lakes but does not mention the impact to Little McCarthy Lake. If there will be no dewatering to the lake it should be noted or if there will be impact it should be listed.

**Section 3.3.3.3**

The discussion mentions that there will be no nutrient loading to Swan Lake but there is no reference to other lakes in the area. This section should be updated to include all lakes including Little McCarthy.

**Table 3.1**

The table shows that physical impacts will be covered in section 4.3. There is no reference to Little McCarthy lake but the EIS mentions that the lake wetlands will be reduced by 30%. Since this lake relies on this water flow to flush the lake it will become a stagnant pool. Monitoring, flow augmentation and level monitoring should be included as well unless the option is given to include the lake inside the project boundary and MN Steel will relocate residents that are willing to move at fair market value since property values have declined due to the project.

**Table 4.1.3A**

This table should be updated to include area 611. Since there is impact to Little McCarthy lake by reducing the watershed flow by 30% unless the lake is inside the project boundary and MN Steel will relocate residents that are willing to move at fair market value since property values have declined due to the project.

**Page 4-21**

The EIS mentions that ATV use in the area had caused damage to vegetation and soils and the frequent activity appears to diminish the use of the area by wildlife. This is a generalized statement and there is no real evidence provided to support the claim. If this statement is kept in the EIS a wildlife monitoring program should be implemented since the area is heavily used by deer and is an excellent location for grouse hunting.

**Section 4.1.2.8**

This section mentions that the change in wetland hydrology is not known due to limited available data on wetland characteristics outside of the project impact area. It is unacceptable to not know what the project impacts will be to local wetlands. Either the appropriate models be setup to predict this change or a research study should be conducted to gather the correct data. The company is not being a responsible neighbor by basically stating trust us to do this project although we don't know what is going to happen. The alternative is to offer a relocation option to residents right on the project boundary at Little McCarthy Lake and relocate them at fair market value since property values have declined due to the project.

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This section goes on describing how the Little McCarthy Lake wetlands downstream from the plant would receive a 30% reduction in area with 66% of its wetlands being directly lost due to plant construction. Little McCarthy Lake relies on this water flow and is the primary means of keeping the lake from being stagnant. After the project is implemented the lake will become a stagnant pool that will impact the plant life and fish populations. There is no mention of this analysis in the EIS. The company should model the impacts including a routine monitoring program collecting samples to prove that the impacts represented are accurate. Even if the projected changes are accurate there is no mention of how the project will keep the lake in its pristine condition. Residents of Little McCarthy should be considered inside the project boundary if they choose to be relocated by the company, at fair market value, due to the project since the lake will be changed forever.

6

#### **Section 4.1.3.1**

This section mentions the proposed wetland mitigation strategies but does not mention Little McCarthy Lake although the lake will be directly impacted. If residents are not offered a relocation option by the company the lake wetlands should be included in the mitigation and restoration process since the lake will become more stagnant directly caused by the project.

6, 8

#### **Section 4.1.3.2**

This section mentions that additional wells could be installed to monitor potential indirect impacts to the wetlands for Little McCarthy Lake but since the EIS covers the impacts that are expected to happen these wells should not be an option. The wells should be installed so that the projected impacts can be monitored unless the project boundaries are extended around the lake and residents are given a relocation option by the company at fair market value since property values have declined due to the project.

8

#### **Section 4.2.3.3**

This writeup provides conclusions on assumptions. There is no data to backup the projects claim that there will be no impact to the residential wells. Modeling should be conducted to prove out the companies claim of no impact and if there is no data available a research program should be funded by the company to provide the data necessary to verify the companies claim.

9

#### **Section 4.3.2.10**

This section states that Little McCarthy Lake water level will decrease by 0.03 inches. There is no evidence backing up the claim. The company is using generalizations by comparing Little McCarthy Lake to Little Sucker. Since the impact can not be directly inferred from the writeup, modeling should be used to predict the actual impact to the lake. As discussed above this lake requires the stream entering the lake from the South to flush the lake (reference section 4.3.1). The lake will become a stagnant pool if this water flow is disturbed. Since the lake will be directly impacted a study should be conducted to verify water quality before and after the project and the lake should be kept at the existing conditions or improved including analysis on the fish and plant life. The alternative is to have the company offer relocation options to residents of Little McCarthy Lake that are willing to move at fair market value since property values have declined due to the project.

6



**Section 4.5.1**

This section does not discuss the impacts to Little McCarthy Lake although the sections above describe the impact that will occur. For completeness the analysis should be included.

6

**Table 4.7.7**

The table shows that there is no BACT analysis provided to control fugitive dust emissions but fugitive dust control plans have been implemented by several facilities in MN. This should be considered as a BACT option to ensure that dust emissions are mitigated.

10

**Section 4.7.2.2.1**

The backup generators and stacks should be included in the modeling analysis although they are only used during upset conditions. The model will not be conservative enough without the generators and emissions will be underestimated. The “worst case day” is typical industry standard for modeling emissions.

11

**Table 4.7.9**

This table does not include results for particulate matter emissions (PM) and only references PM10 emissions. The modeled impacts for PM emissions should be included since front half emissions versus condensable emissions will be higher due to the amounts of dust particles.

12

**Table 4.7.16B**

This table should also include PM emissions since the emissions could be expected to be higher than PM10 emissions since the majority will come from dust.

**Table 4.7.19**

The table summarizes that particulate and gaseous emissions will be reviewed at receptor 13. Not only will the water levels be impacted at Little McCarthy Lake but so will the air residents breathe. The company should be required to install ambient air monitors for all criteria pollutants at this location to demonstrate that the emissions will not exceed MAAQS and NAAQS standards. The alternative is to offer relocation options to the residents of Little McCarthy Lake that are willing to move at fair market value since property values have declined due to the project.

13

**Page 4-119**

This section mentions that an updated analysis could show results greater than previously analyzed for subsistence fishing in and around receptor 13. Since this receptor is for Little McCarthy Lake according to Figure 4.7.2, the company should be required to implement a monitoring program to ensure water quality, plant life, and fish population impacts are minimal or relocate residents that are willing to move at fair market value since property values have declined due to the project.

14

**Section 5.1.2**

This section summarizes the proposed emission increases in ton per year. The total emissions for PM10, SO2 and NOx are exceptionally high compared to other industries in MN. Higher BACT thresholds around \$15,000 per ton of reduction should be considered to ensure that MN air quality does not degrade. Other sources, like refineries in MN, emit just 5000 tons per year for all criteria pollutants combined. The project should be required to implement higher cost controls to level the playing field with other industries.

15

**Section 5.2.1.4**

This section mentions cumulative project emissions and statewide trends. This project is relying on other industry to keep emissions in MN to a reasonable level. MN Steel should be required to be a part of this reduction strategy rather than relying on other industry to offset the emissions that they will be creating. Higher BACT thresholds should be considered since this is a green field project.

16

**Section 6.4**

The analysis for the endangered species in and around the project boundaries is being completed by using generalizations. The DNR and MPCA should work with the USFWS to ensure that modeling is conducted for each criterial pollutant by endangered or threatened species to provide data to support the vague conclusions provided.

17

**Section 6.4.1.1**

This section relies on generalizations to conclude that the Gray Wolf is unlikely to make dens in the project area but there are several sightings of Gray Wolves by local residents. To just generally conclude that there are no dens or rendezvous areas is unacceptable due to the routine sightings in the area. Surveys should be conducted to ensure that there is no impact to the Gray Wolf.

18

**Section 6.8.2**

There is no mention of the highway 8 and local road proposed to intersect with highway 58. This will become a major intersection and should be evaluated for noise, dust and traffic flow.

19

**Section 6.8.2.2**

Generalizations were used to conclude that noise impacts will be negligible. At this point the water and air quality will be impacted at Little McCarthy lake and now noise will be an issue for residents as well. Modeling and surveys should be conducted to show that noise from highway 58 and highway 8 to 58 would not be a concern. Residents of Little McCarthy Lake will be able to hear traffic to the South and West due to this project. Traffic today using these roads can be heard from the lake and the project will only make the traffic noise worse. Along with the surveys and modeling efforts the company should install noise monitors around the lake or setup noise monitoring strategies. The alternative is to offer residents that are willing to move a relocation option at fair market value since property values have decreased due to the project.

3

**Section 6.11.3.1**

This section mentions that rerouting the snowmobile trails is not required. The company is already relying on other industry to offset the emissions they will be creating and is now saying the trail relocation is not required. The company does not seem to be acting as a responsible neighbor to the residents and community. These trails promote tourism in the area and the company should be required to relocate them.

20

The proposed relocation routes snowmobiles down highway 8 to Little McCarthy Lake road. Residents of Little McCarthy Lake not only have to deal with their lake quality being impacted, breathe the air with pollution, listen to the vehicle traffic and now listen to the snowmobiles. The company should offer relocation options to residents that are willing to move at fair market value since the impact to daily life is very clear based on all of the discussions above.

3

**Section 6.12.2**

The ambient air quality boundary goes right along the East side of Little McCarthy Lake. The residents on this side of the lake should be given the option of relocation at fair market value due to all of the impacts discussed above.

21

## New Text Document

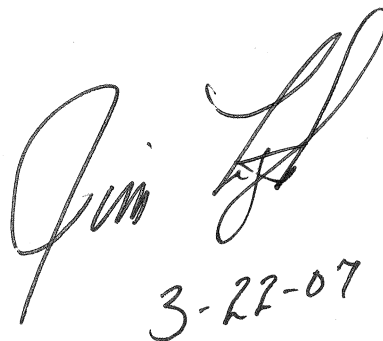
My name is Jim Fetzik and I have 31 years of experience in the mining industry with working on and around tailings ponds as part of my job. I can tell you there is no new technology for controlling dust on these ponds, when the wind blows the dust will follow. With Nashwauk, Pengilly, and Swan Lake in close proximity of this tailings facility they will surely get dust from this location. You cannot control the dust all the time. I realize there is better grade wetlands in the alternate site, but surely not better than Swan Lake. These wetlands should not be put before 3000 people who live around the purposed tailings pond. The population density of the alternate site is much less. The pond you are purposing to use was designed and built in 1965 and with the more leanant pollution standards of that era there are pollutants burried in there we don't want to disturb. When this pond was active Swan Lake was a mess, when this pond was vegetated in the mid 1980,s Swan Lake started a long recovery process and should not be jepordized again by this pond .

If the alternate site is used, MSI would not need the land south of hwy169 leaving it for the public to use. There is currently a state multi use trail that runs through this property along with a spur trail to Nashwauk that would be off limits should MSI be given control of this property. Blue Lake is in the middle of this tract of land that could also be posted, and or pulluted.

If the alternate site is used it would be a shorter distance from the plant site to pump the tailings resulting in less maint. and lower costs for MSI.

I have no axe to grind with MSI and am in favor of this plan comming together but the tailings facility should not go south of HWY 169. With the use of some common sense we can all work together to make this plan a reality. If you have any questions about what I have told you please call me at 218-885-1326 I would welcome the opportunity to speak with you about these details.

Jim Fetzik  
30603 East Shore Drive  
Pengilly MN 55775



3-22-07

**Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers**

**Draft EIS Comment Form  
Minnesota Steel Project**

Name: Charles D. Ross  
Address: 18990 S. Sucker Lk. Rd.  
City: Nashwan State: MN. ZIP: 55769

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007:**

Fold

My main Concern is NOISE. Now this is  
a very QUIET & serene environment. Who is  
going to monitor the noise? Is a noise Level  
being taken at this time and also at later  
Times of this project? My wife also has  
a lung disease. Is the air quality going to be  
monitored closely? <sup>During The building of The Infrastructure?</sup>  
Would you please answer these  
questions for me.

Thank you  
Hohl

Signature: Charles D. Ross Date: 3-15-07

Scott Ek  
Minnesota Department of Natural Resources  
Environmental Policy and Review  
500 Lafayette Road, Box 25  
Saint Paul, MN 55155-4025  
[Environmental.Review@dnr.state.mn.us](mailto:Environmental.Review@dnr.state.mn.us)

Jon K. Ahlness  
Regulatory Branch, St. Paul District  
U.S. Army Corps of Engineers  
190 Fifth Street East, Suite 401  
St. Paul, MN 55101-1638  
[jon.k.ahlness@mvp02.usace.army.mil](mailto:jon.k.ahlness@mvp02.usace.army.mil)

March 23, 2007

Mr. Scott E. Ek  
Principal Planner  
Environmental Policy and Review  
Division of Ecological Services  
500 Lafayette Road, Box 25  
St. Paul, MN 55155-4025

Dear Mr. Ek:

We have recently reviewed the Environmental Impact Statement for Minnesota Steel Industries LLC Taconite Mine, Concentrator, Pellet Plant, Direct Reduced Iron Plant and Steel Mill Project. You, and all who contributed to this project, can be commended for work that was diligent, comprehensive, and respectful of the concerns of the people who will be impacted.

We own property on Little McCarthy Lake and hope to make it our full-time home in the future. Our concern lies with the closing of County Road 58 just past the cemetery, which is the most direct route to Nashwauk for those who live in and travel to that area of Itasca County. The maps we have seen show *Proposed Road Option 2* as a north/south extension of County 58, cutting between Big and Little McCarthy Lakes and connecting with County Road 8. While this route is longer and more inconvenient than the current road to Nashwauk, we support and encourage forward movement to complete this as a substitute paved route and a reasonable compromise to the current road closing.

Again, thank you for the thorough consideration and mitigation of any negative impacts resulting from the proposed project.

Sincerely,



Tim Hickey and Mary Zanoni  
18266 County Road 611  
Nashwauk, MN 55769

Cc: Itasca County Board

**From:** <Marysellemueller@aol.com>  
**To:** <info@dnr.state.mn.us>  
**Date:** 2/24/2007 4:27 PM  
**Subject:** Proposed Mine Steel mill

TO: The Department of Natural Resources

Re: The proposed new Mine & Steel Operation in Itasca County

Date: February 28, 2007

I am against any new mining - steel operation in Itasca County. Our natural resources are so precious here in Minnesota. We have already seen what damage has been done by previous mines, logging and the explosion of new developed cabins in the Northern part of the state.

Wildlife has been affected. The water has been affected. Our natural resources, such as wild rice, trees, plants, animal habitat have been affected and are in decline. There is a time to acknowledge to ourselves that the future of this world is not dependent on "MORE". It is dependent on holding what land is left as Sacred and that we instead, will stand to protect our environment instead of continuing the rape of it.

For example, the Rain Forest in South America is now being raped to the bare earth because gold was recently found there. The devastation is enormous. There are already mudslides of huge amounts. Animal habitat has been irrevocably changed forever.

This continued mining is of great threat to the world. Sustainability is a choice that we ALL can chose to make. Choosing to live our lives with the next seven generations in mind, helps all of us conserve and keep precious the land and habitat that is left undisturbed.

Do we really need to mine anymore? Is there really that much need for steel anymore? Let's look at alternative sources for building. Let us each choose to reduce our need and addiction to material goods.

1

There is no dilemma in my mind as to whether or not to build this new steel mill and mine. NO.

The question instead is: Is the DNR of Minnesota prepared to stand firm on the philosophy it was

built upon? Protecting the land, the  
 animals, the water for all of us today  
 and for the next seven generations?

I certainly hope they are and that we all are.

Sincerely,  
 Mary Mueller  
 1264 North Arm Drive  
 Orono, MN 55364  
 (952) 472-1678

<BR><BR><BR>\*\*\*\*\*<BR> AOL now offers free  
 email to everyone. Find out more about what's free from AOL at  
<http://www.aol.com>.

Sir,

I attended the meeting in Nashwauk and was very disheartened to see that a great many of our politicians, residents and business people do not know the difference between an Environmental Impact and a Socio-economic Impact. I had hoped that the speakers would be held to the proposed agenda. It is hard to imagine that people today don't realize that there truly is a global economy and when China, Russia, Brazil, Venezuela and Nigeria are all on line with steel production, it will sell for far less than MSI is going to want for their product. Northern Minnesota will have another monument to stupidity to go along with Iron World, the chopsticks factory, Tirecycle, Keewatin's auto nugget plant, Techmar of Cohasset and Endotronics. It was almost funny to again hear parents making statements about their children's desire to stay in the area. I was a Navy Recruiter in the area from September, 1985 to March of 1990. It has been known since the '70s that this is very fertile ground for recruiting as 85% of the new graduates want to get off the Iron Range. Grand Rapids has been the number one small station for the Minnesota, Wisconsin, N. Dakota District for decades. Many wish to return later in life but not to an over priced, over populated and over polluted area that resembles what they want to get away from.

I grew up seven miles northwest of Nashwauk in the 50's and 60's. I built a home one mile west of my father's in 1974 in the valley of the creek that runs from Big McCarty to Crooked Lake. I lived there until joining the Navy in 1979. I worked in the mines from May of 1970 until May of 1979. The vast majority of my time was spent outdoors prior to my enlistment and is again now that I have retired. The noted changes are drastic, may be related to global warming or to some other factor within the environment.

My lawn is sandy and 30 years ago I would see from 25 to 40 mud turtles nesting there each spring.....I have seen one each year since 2002. The creek bed was once home to a million frogs, toads, garter snakes, salamanders and newts. Songbirds by the hundreds would awaken the dead every summer morning. Now there is only silence, or the sound of automobile traffic. My apple trees bloom but there have been no apples the past three years. Honey bees are very hard to find and have required importing for pollination in Minnesota and several other states as well as some countries in Europe. Two of the lakes that we attempted to harvest rice last fall had only empty hulls..... a canoe full that should have weighed 200 to 210 pounds weighed 40. There are very few ducks, especially divers; we have seen a single coot (rice hen) in five seasons of ricing and scouting.

Many of our highways have been in place for more than 50 years and until the past five, there has been no noted problem with forest health. A drive along any of the major roadways (especially on the east side of a north/south roadway) it can be noted that conifers of all varieties started dying about 5 years ago. Is this being investigated by the DNR or has it even been noted? Is it increased CO2 or some other contaminant due to ethanol use that increased about the same time? A walk in the forest will show that all types of trees and of all ages are dying at an unprecedented rate.....Why?

The DNR has done studies on mercury contamination in our lakes. This information is available though not widely publicized. At some point, our tourists are going to discover how bad it is and that it is increasing. Due to the findings of the studies being done showing a positive correlation between methyl mercury and birth defects/health effects,



Minnesota and the DNR may be held accountable, suits filed, tourist dollars and license fees dwindle?

2

Numerous pollutants will be discharged from the MSI stacks and will end up in the Mississippi River, the drinking water source for Minneapolis. Ground water seepage and heavy rainfall overflow will also end up in the Mississippi via Swan Lake. I also noted at the Nashwauk meeting that there was no reference made to the 30 year plan in which the 70 foot high tailings dike is to extend two thirds the length of Swan Lake, will engulf O'Brien Brooke and Hay Lake and will be less than 400 yards from the East Shore Drive.

3

My personal and Navy travels took me to steel towns and cities in a half dozen foreign countries as well as Gary/Hammond, ID and Pittsburg. All of these places have two things in common.....they are dirty and they stink. It is sad that the Iron Range residents can't understand the difference between the production of taconite pellets and steel. This filth and stench will not go well with the tourist trade.

4

In 1996, I brought six Japanese friends to Minnesota. My brother and a friend took them flying over the area. They had many questions about the mining. Several actually had tears when they were convinced that the area from Grand Rapids to Babbitt that is now a wasteland of rock dumps and pits was once forests, lakes and streams. That we could have done this a hundred years ago out of ignorance and without any attempt at reclamation is understandable. To do it now out of greed is criminal as we now know that the elevated incidence of cancers, asthma, emphysema, and birth defects on the Range are related to mining. My nine years in the mines left me with nine spots of silicosis on my lungs that nearly disqualified me from enlisting in the military. The mining jobs were once good paying jobs but that has changed. They are called "good jobs" by those that have never worked in the mines. To get a different perspective on the definition of "Good Job", please ask the widows and children of the men who worked there but didn't live to see their 60<sup>th</sup> or even 50<sup>th</sup> birthday.

5

If MSI were following the lead of NUCOR in recycling, steel production would make sense rather than sending several million tons of scrap to China every month so that we can buy it back as a finished product.

6

Thank you for allowing me the opportunity to voice an opinion. It will be a sad moment when I have to leave my childhood home and a very hollow victory to say "I told you so" should this plant be built.

Very Respectfully,  
Frank R Weber, US Navy and National Steel Retiree

**From:** "Rich Libbey" <rdlibbey@mchsi.com>  
**To:** <environmental.review@dnr.state.mn.us>  
**Date:** 4/2/2007 4:20 PM  
**Subject:** Minnesota Steel

**CC:** "Rich Libbey" <rdlibbey@mchsi.com>

Dear Sirs: I am writing concerning the DEIS for the Minnesota Steel project. The Minn. Dept. of Health released a study this last week regarding a link between taconite tailings and the occurrence of mesothelioma. I am requesting that this document be considered as a part of this project to determine if asbestos like particles could be a problem at Minnesota Steel.

O'Brien lake in sections 4,9,and 16 T56N R22W borders the east side of the proposed tailings basin. A proposal several years back by Minnesota Iron and Steel would have filled in this lake filling it with tailings starting at the south end. What guarantees do we have that as this project goes beyond 20 years that this will not be proposed by Minnesota Steel. This lake is heavily used via an unofficial access on the north end of the lake.

I would like to see the unofficial access on the north end of O'Brien lake be officially designated and protected for public access as part of this project. I have concerns about the loss of public [Itasca county] lands as it relates to this project. Thousands of acres of land currently used by the public for hunting and other recreation could be in jeopardy. I would like this impact to be considered and mitigated. The county is considering exchanging 7000 acres of its land for Blandin Paper Co. land in the mining boundary. This will result in the loss of public use of these lands if they are in the mining boundaries. Proposals to either sell or lease these lands to Minnesota Steel could result in lost recreational and timber harvesting opportunities.

Senator Tom Saxsaug has stated at public hearings that there would be no loss of public lands. I would like to see this issue addressed. The proposal to sell county land to Minnesota Steel would mean the county would have to go on the open market to replace it. Replacing thousands of acres of land with rising land prices would be a difficult task at best.

I would like to see downward directed lighting so the night sky remains dark. Has the possibility of pit overflow after closure been addressed. The abandoned Canisteo pit north of Bovey is nearing overflow costing the tax payers millions of dollars, Will this be an issue and who will pay for it? Section 4.7.2.3.2 states that the tailings basins will act as a mercury sink. Are there studies available to support this claim?

What impacts could there be on the aquifer as the pit is dug. If back filling of the pit occurs after 10 years is there the possibility of leaching chemicals entering the aquifer?

Sincerely, Richard Libbey  
Hale Lake Drive  
Minnesota 55744

18603  
Grand Rapids,

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**Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers**

**Draft EIS Comment Form  
Minnesota Steel Project**

Name: C. SCOTT Jeffers  
 Address: 31590 Spruce Drive  
 City: Pengilly State: MN ZIP: 55775

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007**:

- 1) **I feel that this development, and the direction of the expansion, will put my home in jeopardy from blasting damage. My immediate neighbor's property was in the "blast zone" when Butler Taconite was in operation. In expanding the development I believe this "blast zone" would encompass my home also. No one wants to admit what this "blast zone" will be, we've asked many times. M.S.H.A. doesn't allow blasting within 2200 feet of occupied structures. I'm sure the distance to someone standing, unprotected in their yard would be greater. Even at 2200 feet, the Pit #6 that will be approximately 1000 feet from Snowball Lake, will endanger fishermen 1200 feet from shore on public waters.** 1
- 2) **Mining operations are inherently dusty. All levels of government have been making smoking ban ordinances for air quality. I would rather be in a room with someone smoking a cigarette for a few minutes, than to have to breath the dust and pollutants from this major operation 24-7-365.** 2
- 3) **Noise pollution will also be a detriment to quality of life.** 3
- 4) **Before anymore tax payer dollars are spent to broker land exchanges with Blandins or build railroads for this project, or any other infrastructure, you should take care of the people in the Snowball Lake area who will be displaced by this project.** 4
- 5) 5

Signature: C. Scott Jeffers Date: 3-29-07

**Minnesota Department of Natural Resources &  
U.S. Army Corps of Engineers**

**Draft EIS Comment Form  
Minnesota Steel Project**

Name: LOUIS BAUMCHEN & AMY DRAKE-BAUMCHEN  
 Address: 13107 LITTLE SWEDEN LOOP  
 City: NASHWAUK State: MN ZIP: 55769

The following comments are on the Draft EIS for the Minnesota Steel Project (attach additional pages as necessary) The last day to submit comments on the Draft EIS is **4:30 p.m. on April 2, 2007**:

HELLO,

FIRST, I WOULD LIKE TO SAY THAT THE IDEA OF THIS PLANT COMING INTO OUR SMALL COMMUNITY WOULD BE GREAT ECONOMY-WISE FOR EVERYONE INVOLVED.

AS YOU CAN TELL BY OUR ADDRESS, WE WOULD BE WITHIN A COUPLE OF MILES FROM THE LOCATION OF THIS PLANT. WE HEAR PEOPLE COMPLAIN ABOUT THE SMELLS AND AIR-BORN PARTICLES FROM NEARBY PLANTS. WE ARE CONCERNED ABOUT OUR LITTLE CORNER OF THE WORLD.

WE STEP OUTSIDE EVERYDAY TO FRESH CLEAN AIR. THE WATER IS AND ALWAYS HAS BEEN CLEAN AND TASTES WONDERFUL. WE HAVE RELATIVES THAT WILL HAVE US BRING IN BOTTLES OF OUR WATER FOR THEM TO DRINK INSTEAD OF THEIR WATER. OUR YARD IS LIKE A LITTLE PARK WITH THE BEAUTIFUL TREES AND VARIETY OF PLANTS AND A SMALL POND IN THE BACK YARD FOR THE LITTLE CRITTERS TO GET A DRINK. WE HAVE A BABY MONITOR SET UP IN OUR BACK YARD AND INTO OUR HOME SO WE CAN HEAR ALL OF THE BEAUTIFUL BIRDS SING THEIR THANK-YOUS FOR THE SEEDS WE PUT OUT FOR THEM. DEER GRAZE IN OUR BACK YARD AS THEY STOP FOR A DRINK OF WATER IN THE POND. EVERY SPRING OUR AREA IS ABUZZ WITH SONGS FROM THE FROGS AND EVERY SPRING THE SAME MALLARD DUCKS WILL RETURN TO OUR LITTLE POND IN THE BACK YARD. NOW THIS MAY NOT SEEM LIKE MUCH TO MOST PEOPLE NOWADAYS, BUT IT MEANS THE WORLD TO US AND OUR LITTLE FRIENDS IN OUR YARD.

WE WOULD JUST LIKE TO KNOW THAT THIS WON'T ALL END. SOME SORT OF PIECE OF MIND KNOWING THAT WE CAN BE HAPPY THAT THE ECONOMY WILL BE BETTER WITHOUT WAITING FOR THE OTHER SHOE TO FALL SO TO SPEAK. IS THAT POSSIBLE TO FEEL THAT WAY? DO WE NEED TO BE CONCERNED ABOUT ALL OF THESE ITEMS??

THANK YOU FOR YOU TIME ON LISTENING TO OUR CONCERNS. WE APPRECIATE IT AND WE HOPE EVERYONE WILL BE HAPPY IN THE END.  
THANKS.

Signature: Amy Drake Baumchen Date: 3-27-07

Scott Ek  
Minnesota Department of Natural Resources  
Environmental Policy and Review  
500 Lafayette Road, Box 25  
Saint Paul, MN 55155-4025  
[Environmental.Review@dnr.state.mn.us](mailto:Environmental.Review@dnr.state.mn.us)

Jon K. Ahlness  
Regulatory Branch, St. Paul District  
U.S. Army Corps of Engineers  
190 Fifth Street East, Suite 401  
St. Paul, MN 55101-1638  
[jon.k.ahlness@mvp02.usace.army.mil](mailto:jon.k.ahlness@mvp02.usace.army.mil)

**Bethel Anderson**

**From:** "Bethel Anderson" <bander@callta.com>  
**To:** <Scott Ek>  
**Sent:** Saturday, March 31, 2007 9:05 AM  
**Subject:** Fw: Comments on draft EIS Mn Steel

----- Original Message -----

**From:**  
**Subject:** Comments on draft EIS Mn Steel

I have some comments regarding inadequacy of the Minnesota Steel Draft EIS and its evaluation of mercury issues.

In section 4.7.2.3.1 under Human Health and Ecological Impact assessments, it mentioned that HHSRA and SLWRA were done in 2006 to estimate mercury deposition within 10 kilometers of the facility. I see no mention of the deposition within 100 kilometers which is usually considered for deposition of oxidized mercury, which is the pollutant from this facility that is most significant for Minnesota watersheds. If you use a 100 kilometers analysis, then the "zone of interest" should include Lake superior because much of the very significant oxidized Hg would fall in the Lake Superior watershed. The Wind Rose for the area shows that the prevailing wind patterns would place much of the 4 pounds per year of oxidized Hg in the St Louis River watershed which flows into the Lake Superior. That is why it is significant to the LaMP program.

1

Question #1. Why isn't Lake Superior considered in your "zone of interest"?

In the mercury pollution discussions, I find the Draft EIS to be guilty of "fuzzy math". In section 4.7.2.1.4 LoTox would be used **if** technically and economically feasible and that it **might** have some ability to control **some** mercury. Then in 5.3.1.3.2 with regards to mercury methylation by sulfate reducing bacteria, the draft talks about **possible** decrease in sulfate deposition. On top of that it fails to address the largest sulfate contribution to the St Louis River, which is the Mintac sulfate release to the West Two River. The Minnesota Steel Project would be located about 13 kilometers up wind from the Headwaters of the West Swan River which enters the St Louis just 14 miles down stream from the flood of sulfate ions released by Mintac. How will the 4 pounds per year of oxidized Hg released from the facility impact the largest tributary in western Lake Superior? It will be deposited over most of the watershed below Forbes Mn.

2

Question# 2. How will the EIS deal with the oxidized Hg interacting with high levels of sulfate ions in the St Louis River?

This impact is in the 1885 Ceded Territory. The Fond du Lac Reservation which has major responsibility for water quality of the St Louis River, is within about 40 kilometers of the facility. Remember that the very reactive 4 pounds per year of oxidized mercury is primarily deposited within 100 kilometers after being released.

3

Question #3. Should 1855 ceded territory treaty issues be removed from "Issues for Which Significant Impacts Are Not Expected" and moved to "Potentially Significant Issues Requiring More Extensive Analysis"?

The last issue I have with the EIS is in regards to the Mercury TMDL. Impacted waterbodies such as the St Louis River are listed as impaired for methyl mercury in fish tissue. Section 303(d) of the Clean Water Act mandates clean up that leads to delisting of such water bodies through a TMDL process. I serve on the St Louis River Mercury TMDL Partnership board of directors. Even though Minntac has presented their mercury impacts to us several times, we have heard nothing about Minnesota Steel from either the state or the company about this mercury impact. Until we have a mercury TMDL in place that would lead to delisting this water body, the courts have determined that additional daily loads cannot be permitted for listed water bodies such as the St Louis.

4

Question #4. How are you going to get around these legal requirements to permit this facility?

The state mercury TMDL calls for a 93% mercury reduction. Yet, with all the cumulative reductions and additions listed in table 5.3.2 the state will fall short of its mercury goal by 1,543 pounds per year.

Question #5. Would allowing the mercury emissions from this plant, not impair the prospects of a successful mercury TMDL for the state of Minnesota?

Respectfully submitted, Leonard Anderson 4-31-07

*Leonard Anderson*

3/31/2007

**From:** "Greg Walker" <walkerg@mninter.net>  
**To:** <environmental.review@dnr.state.mn.us>  
**Date:** 3/30/2007 2:58 PM  
**Subject:** MINNESOTA STEEL - DRAFT EIS  
**Attachments:** STONE RD RABBIT PARK RD.jpg; FARM TOPO.jpg

**CC:** "Shelley Rasche" <smrasche@msn.com>, "Jeff Rasche" <jeff.rasche@medtroni...  
**ATTN:** MR. SCOTT EK , MN DNR & MR. JON AHLNESS, USACE

REF. 6.13 - INFRASTRUCTURE and the attached files.

We are 100% in favor of this large scale mining project but would like designers and regulatory agencies to consider our concerns with respect to two infrastructure items.

Our farm is located at 36213 Stone Rd, Nashwauk, MN 55769. Our southern property line abuts the northern boundary of the Permit to Mine area for the Minnesota Steel Project. Please refer to the attached files, plus EIS maps, for the following discussion.

1. Northern 230KV Powerline Routing -- We understand that this is a separate MN EQB process issue but we want to go on record with our thoughts and opinions. The current powerline layout bisects our property and would significantly diminish our use of that property. We would like to suggest one optional which would involve moving the powerline west to the Hilltop Rd corridor thereby lessening the impact not only on our property but also on several other residential properties along the current routing.

2. Stone Rd/Rabbit Park Rd -- This public/unimproved road leaves our property, crosses our southern property line (and the northern Permit to Mine boundary) and proceeds southeast eventually connecting with MN Hwy 65 near the FAA Radar Site. It has always been known to us and our neighbors as the "Rabbit Park" road and it has been in use for over 100 years as an access to the woodlands south of our farm by hunters/trappers, loggers, 4-wheelers/snowmobilers, and bow and berry-pickers. We do not see any overt references to closing this road in the draft EIS but there are general comments about land use inside the Permit to Mine boundary. We would like to see that this road remains open as the mine project advances.

As property owners/taxpayers we all have a deep and rich "Ranger" heritage and legacy to uphold and perpetuate. We are completely satisfied with all other aspects of the Draft EIS and the thoroughness and quality of the document. We know that air & water quality monitoring and control will be state of the art ... meeting and exceeding state and federal mandates with MACT/BACT. This major project is going to provide a big boost to Northern Minnesota's economy and it should move forward this year.

Thank You,

Greg & Barb Walker, 5706 Lone Oak Dr, Savage, MN 55378. 952-856-6096

Leon & Shelley Rasche, 23519 St. Francis Blvd, St. Francis, MN 55070. 763-753-2295

**From:** "sue stish" <sues1@uslink.net>  
**To:** <environmental.review@dnr.state.mn.us>  
**Date:** 4/1/2007 10:15 PM  
**Subject:** MSI letter.doc

As third generation citizens of the Iron Range we find we must voice our concerns about the proposed MSI plant in Nashwauk, MN. We are worried about the environmental implications that this plant involves. CO2 emissions must be stopped now as global warming is a reality. We are concerned about the mercury and other toxic chemicals that will be produced here and fed into air, soil and water. Without mining the mid-Range area has just begun a healing process. How can adding about another dirty step in the steel making process to pollute and further contaminate our natural resources even be considered? Medical research is continuing to link miners' lung cancers with particulates produced in the mining processes.

I am a retired miner, our dads, uncles and grandfathers were employed in the mines and in mining related industries. Mining jobs are NOT good jobs as the people pushing this want us to believe. The nature of the steel industry is cyclical at best. In my 32 years at National Steel strikes, layoffs, shutdowns and bankruptcies were the norm. These incidents accounted for over 10 years of my career. My family has lived the so called "good life". Being without a dependable job for nearly 1/3 of my career and now with only 1/2 of my promised pension has not been good for me and my family. Our dads and grandfathers were employed only seasonally.

We must consider that China and other developing countries are coming online with cheap steel. Cheap Brazilian iron ore, Japanese and European steel is a threat to our domestic steel industry. We must be realistic here and know that we cannot compete with their lower costs and still provide a living wage for young steelworkers and their families. Consumers of steel throughout the world will buy at lower prices.

MSI is a bad idea environmentally, health-wise and economically. The Iron Range is doing just fine without belching smokestacks and jobs that are only part time.

Ed and Sue Stish

Balsam Township

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**Comments submitted to the Minnesota Department of Natural Resources and U.S. Army Corps of Engineers Draft EIS for Minnesota Steel Industries.**

To Scott Ek and Jon Ahlness,

The following comments are areas of concern that need to be addressed in the EIS for Minnesota Steel Industries (MSI).

Groundwater Contamination

The Minnesota Department of Health is soon to release a study showing a water connection between abandoned water filled mine pits and city well water supplies. This is critical information that should be weighed into the EIS. I request the EIS address the following groundwater quality issues:

1. There should be an explanation of how groundwater quality regulations to prevent contamination of groundwater supplies will be enforced. | 1
2. Conventional and hazardous water pollutants should be addressed. On-site recycling losses should be considered and quantified. | 2
3. The EIS did not address any toxic metals (except possibly mercury) in the taconite or tailings, which are of primary concern; therefore I request the EIS specifically analyze the toxic metal content of the taconite proposed for mining. | 3
4. I further request the amount of toxic metals remaining in the tailings and overburden be assessed. All toxic metals known or suspected of affecting human health should be included. | 4
5. Small particles capable of being ingested through drinking water should also be included. | 5
6. Finally, an option that prevents any ground or pit water used by MSI from re-entering the groundwater system should be evaluated. | 6

Air Emissions

We currently have fish advisory warnings on the amount of fish we can eat because of methyl mercury poisoning. Allowing more mercury to enter into our food chain is alarming considering what we know about its affects on human development. Other toxic metal air emissions were not addressed. Also, the dispersion models favor the BWCA not air pollutant exposure of nearby residents. Specific monitoring and enforcement of air emissions are not addressed in the EIS. Proposed CO2 regulations (anticipated in the next 5 to 10 years) are not considered. Therefore I request:

1. All toxic metals known or suspected of affecting human health should be included in the air emission assessment of MSI. | 6



2. Proposed monitoring and enforcement of toxic pollutant air emissions should be included in the EIS along with measures to be taken to minimize all such emission outputs. | 6
3. The EIS should specifically address the overall MSI contribution to global warming from its CO2 emissions, and a plan to mitigate the emissions. It is not sufficient in the EIS to say no regulations yet exist – they will within the planned lifetime of the plant and measures to reduce those emissions should be included now. | 8
4. A news release by the Minnesota Department of Health suggests that ore mining and asbestos poisoning are linked, and two new studies to be performed will address and possibly confirm that link. I request that local and worker health effects from the potential of particles in the taconite that can act like asbestos in the lungs be included in the EIS evaluation. | 9

#### Socioeconomics

The socioeconomic impact study completed in the draft EIS does not include the following anticipated economic negative impacts and losses:

1. Loss of tourism industry businesses. The EIS should include what jobs will be lost and the impacts the proposed steel plant will have on our local businesses such as; area resorts, gas stations, restaurants, retail stores, auto repair garages, etc. | 10
2. The increased health care costs to Itasca County and the State of Minnesota that will be incurred as a result of the anticipated health impacts to underinsured or uninsured residents of the surrounding communities. The EIS should specifically address questions such as:
  - a. How much Itasca County will have to pay for the under/uninsured.
  - b. How many out-of-pocket dollars will be spent on clinic, hospital, prescription drugs, etc of under/uninsured residents, and
  - c. How do those expenditures correlate to disposable income not entering the business sector.
  - d. What impact will loss of work days have on low income residents and their overall economic health, and
  - e. What will the productivity losses be to the employers/local businesses and how does that impact their profit margins.
 | 11
3. A cost-benefit analysis should be completed to have a better socioeconomic picture of the proposed steel plant. | 12

Respectfully Submitted,  
 Amanda Nesheim  
 30994 Bat Roost Trail  
 Bigfork, MN 56628

R. D. Learmont  
P.O. Box 2756  
Warba, Minnesota 55793  
28 March 2007

Mr. Scott Ek, Principal Planner  
Minnesota Department of Natural Resources  
500 Lafayette Road  
St. Paul, Minnesota 55155-4025

Re: Draft Environmental Impact Statement Comments,  
Minnesota Steel Industries Proposed Project

Dear Mr. Ek:

Thank you for providing an opportunity for review of the Minnesota Steel Draft EIS. I offer the following specific comment:

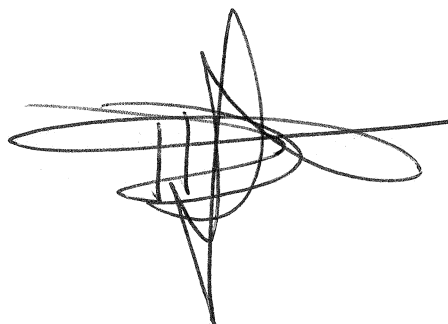
Please do NOT permit long-term or permanent storage of concentrator tailing in a mine open pit, even if that pit area has been deemed as unlikely to be mined again in the future and even if there is fee-owner concurrence.

The basic reasons for this suggestion are two-fold:

1. The value and economics of mineral resources are greatly affected by technology and commodity economics; what is not "ore" now can rapidly become "ore" in the future, sometimes quite quickly, due to changes in technology or economics. Even if in-pit deposition of tailing has the permission of mineral fee owners, the Mesabi Range is a world class mineral resource and I feel it's long-term value should not be encumbered by deposition of an overlay or adjacent lower quality of material for perceived short term benefits.
2. Similarly, there are new technologies and markets that can or may economically utilize tailing as a feedstock - placing the tailing within a mine pit makes it much less likely, due to higher re-extraction costs, that such tailing material could or would be utilized for a "second life".

I can expound on this subject at much length, however, in the interest of the brevity that I expect you need for present purposes, I will halt at this point. I trust that you will understand the gist of my comment and will adequately take it into consideration as you head toward finalization of the Minnesota Steel EIS.

Thank you.



**Environmental Review - MINNESOTA STEEL**

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**From:** "lorihouwman"  
**To:**  
**Date:** 3/13/2007 11:37 AM  
**Subject:** MINNESOTA STEEL

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Is the EIS that is being discussed at the county public hearing, only a preliminary?  
As I understand it, there is much more study to be completed on items that will have substantial impact.  
I.e. - noise, water, air, etc....

1

When is the final EIS going to be completed?

Power of Attorney for a resident living on Snowball Lake, Pengilly, MN.

Respectfully Submitted,

Lori Houwman

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