

Attachment A

Townley, Jill (DNR)

From: Kathleen Abel <kathsmiles@yahoo.com>
Sent: Thursday, August 30, 2012 5:09 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

MN's lakes, rivers, streams, forest, wildlife and more have value beyond any monetary self-interest.

Sincerely,

Kathleen Abel

4200 Luverne Street
Duluth, MN 55804

Townley, Jill (DNR)

From: Audrey Alfson <audreyalfson@yahoo.com>
Sent: Thursday, August 30, 2012 1:26 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
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- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Audrey Alfson
6037 Country Club Road
Houston, MN 55943

Townley, Jill (DNR)

From: Ryan Alger <algerrc@uwec.edu>
Sent: Friday, August 31, 2012 8:43 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
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- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Ryan Alger
724 Niagara st
Eau Claire, WI 54703

Fay, Lisa (DNR)

From: Mary Anderson <ande8473@umn.edu>
Sent: Thursday, August 30, 2012 2:11 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

My family is from this area and relies on our natural resources to survive and sustain our cultural beliefs. Please take a moment to consider our concern.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,
Mary Anderson

Mary Anderson
14 S 8th Ave E
Ely, MN 55731

Fay, Lisa (DNR)

From: Carla Arneson <carneson@frontiernet.net>
Sent: Wednesday, September 05, 2012 12:21 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

The taconite mines have been let off the hook for too long. It is past time to hold them accountable. We have newborns in Minnesota with toxic levels of mercury in their blood; that would not be happening without the sulfates from taconite mining. How much are our babies worth? In the past mining companies have literally done the math, and made the decision to continue polluting, paying the cost of the damage to children. Is Minnesota going to be another Idaho or Texas? Contamination is contamination, whether it comes from a smelter or from tailings basin releases. The life of a child is worth more than a job or a corporation's profit.

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 "Western Pit Progression" at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Clean up its mess or shut down would be true accountability. I would not be allowed to have a septic that polluted the lake I live on. Then imagine how my neighbor would feel if their well was contaminated and their children harmed by my contamination? Corporations now claim they have the same rights as individuals. Not more rights.

The people of Minnesota have a right to clean water. The MPCA is supposed to safeguard that right. If the agency is being politically blackmailed with "do as we say, or we cut your funding," the public has a right to know. We can then defend our waters by defending the agency that is charged with their protection.

Sincerely,
Carla Arneson
Ely, Mn. 55731

Carla Arneson
P.O. Box 336
Ely, MN 55731

Townley, Jill (DNR)

From: jim bambenek <jbambenek@yahoo.com>
Sent: Thursday, August 30, 2012 9:38 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

jim bambenek
209 w mill st
winona, MN 55987

Townley, Jill (DNR)

From: james barnett <jabarnett@frontiernet.net>
Sent: Thursday, August 30, 2012 3:18 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

james barnett
515 e wilson st
ely, MN 55731

Townley, Jill (DNR)

From: Bob Bartlett <bb@phoenixprocessconsultants.com>
Sent: Thursday, August 30, 2012 1:05 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Bob Bartlett
5080 Silver Lake Rd.
5080 Silver Lake Rd.

Townley, Jill (DNR)

From: Robert Benito <elymusicman@gmail.com>
Sent: Friday, August 31, 2012 12:23 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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Sincerely,

Robert Benito
134 N 1st Ave E
Ely, MN 55731

Townley, Jill (DNR)

From: Deborah Bennett-Leet <imagine@midco.net>
Sent: Thursday, August 30, 2012 3:22 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Deborah Bennett-Leet
20583 Everton Ct. N.
Forest Lake, MN 55025/8160

Townley, Jill (DNR)

From: Connie Bock <conniebock@yahoo.com>
Sent: Thursday, August 30, 2012 5:41 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Connie Bock
2160 Havana Rd.
Owatonna, MN 55060

Townley, Jill (DNR)

From: scot bol <earthmannow@gmail.com>
Sent: Friday, August 31, 2012 11:30 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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Sincerely,

scot bol
2021 west 2nd street
Duluth, MN 55806

Townley, Jill (DNR)

From: Ronald & Joann Brown Brown <brown8240@comcast.net>
Sent: Friday, August 31, 2012 7:36 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Ronald & Joann Brown Brown
8240 39th Avenue North
New Hope, MN 55427

Townley, Jill (DNR)

From: Ronald Buckanaga <buckanaga.fdcs@gmail.com>
Sent: Thursday, August 30, 2012 2:19 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Ronald Buckanaga
5118 Knox Ave No
Minneapolis, MN 55430

Townley, Jill (DNR)

From: Christopher Carlson <c_j_Carlson@hotmail.com>
Sent: Wednesday, September 05, 2012 10:19 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Christopher Carlson
16025 Boulder Cir Dr
Minnetonka, MN 55345

Townley, Jill (DNR)

From: Catherine Chayka <kchayka@c-net.us>
Sent: Thursday, August 30, 2012 7:37 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Catherine Chayka
1590 Long Lake Rd
New Brighton, MN 55112

Townley, Jill (DNR)

From: Craig Christensen <lcl333@frontiernet.net>
Sent: Thursday, August 30, 2012 2:03 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Craig Christensen
20661 quint ave n
scandia, MN 55073

Townley, Jill (DNR)

From: Barbara Clark <clarkbe@usfamily.net>
Sent: Thursday, August 30, 2012 6:41 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Barbara Clark
73 Martin Way
Vadnais Heights, MN 55127

Townley, Jill (DNR)

From: Carolyn Clements <aloha3791@aol.com>
Sent: Saturday, September 01, 2012 8:57 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Carolyn

Carolyn Clements
601 Sunset Dr.
Minnetonka, MN 55305

Townley, Jill (DNR)

From: Zach Colatch <ztcolatch@yahoo.com>
Sent: Friday, August 31, 2012 7:13 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Zach Colatch
3401 Bushkill Drive
Easton, PA 18040

Townley, Jill (DNR)

From: Bill Conger <bcconger5@msn.com>
Sent: Monday, September 03, 2012 2:42 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Bill Conger
455 Ridge View Circle
Hamel, MN 55340

Townley, Jill (DNR)

From: Nancy Conger <nancyconger@yahoo.com>
Sent: Thursday, August 30, 2012 3:20 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Nancy Conger
8010 275th Ave NE
North Branch, MN 55056

Townley, Jill (DNR)

From: James Conway <sajacon@q.com>
Sent: Thursday, August 30, 2012 9:53 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

James Conway
4620 Valley DR NW
Rochester, MN 55901

Townley, Jill (DNR)

From: Lisa Coons <lcoons@ssndmankato.org>
Sent: Thursday, August 30, 2012 2:25 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Lisa Coons
418 W. Pleasant St.
Mankato, MN 56001

Townley, Jill (DNR)

From: Nan Corliss <ncorliss41@aol.com>
Sent: Friday, August 31, 2012 10:54 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Nan Corliss
10300 Morris Rd
Bloomington, MN 55437

Townley, Jill (DNR)

From: Jessica Coulter <coulterjm@hotmail.com>
Sent: Thursday, August 30, 2012 10:50 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jessica Coulter

Jessica Coulter
6201 W. 34th St.

Townley, Jill (DNR)

From: Anne Cowie <cowieanne@hotmail.com>
Sent: Monday, September 03, 2012 7:40 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,
Anne Cowie

Anne Cowie
5107 Emerson Ave. S,
Minneapolis, MN 55419

Fay, Lisa (DNR)

From: Sara Culver <culvers@msu.edu>
Sent: Thursday, August 30, 2012 4:20 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

Doesn't the Minnesota Department of Natural Resources routinely demand an Environmental Impact Statement (EIS) for any development or expansion that would affect the wetlands and waters so increasingly scarce, not only in this country, but throughout the entire planet?

Please consider the cumulative harm being done to our irreplaceable waters; these "expansions" & "developments" are "death by a thousand cuts" to our biosphere!

We (largely domesticated) humans seem unaware that the deaths we cause today in our natural world will be our own tomorrow.

Sincerely,

Sara Culver
15260 Lake Michigan Drive
West Olive, MI 49460

Townley, Jill (DNR)

From: Scott Dahlquist <mushwithscott@yahoo.com>
Sent: Monday, September 03, 2012 10:21 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Scott Dahlquist
6479 Colombe Rd
Chisholm, MN 55719

Townley, Jill (DNR)

From: Cheryl Dannenbring <csdanny@cpinternet.com>
Sent: Thursday, August 30, 2012 6:01 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

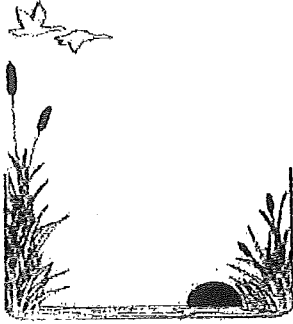
For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Cheryl Dannenbring
1850 Vermilion Rd.
Duluth, MN 55803



Dark River Basin Association
7140 N. Dark Lake Road
Britt MN 55710

Date: August 28, 2012

To: Lisa Fay, Planner Principal
Environmental Review Unit
MNDNR Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul MN 55155-4025

Subject: Minntac Mine Extension Project EAW Comment Letter

Dear Ms Fay:

Since the Dark River and Dark Lake are de facto extensions of the Minntac Tailings Basin, the Dark River Basin Association (DRBA) has been concerned with water quality problems in the Dark River Watershed since we became aware of them in 2001, especially the sulfate/mercury/methylmercury process which has been much in the news lately.

In Item 17 of the EAW under **Mine Extension Area**, it says that; "Additionally, Minntac is planning construction of a seepage collection and return system to be completed in 2013 to collect seepage to the Dark River Watershed as part of the SOC. This would be similar to the Seep Collection and Return System installed in 2010 which collects surface and shallow subsurface seepage to the Sand River Watershed. Reductions in downstream sulfate concentrations in the Sand River Watershed have been observed since the seepage collection and return system initiated operation in 2010".

We have a few questions. Who is monitoring the downstream sulfate concentrations in the Sand River Watershed and is the data available to the public? And when a seepage collection and return system becomes operational on the Dark River Watershed, will downstream sulfate concentrations also be monitored and will that data be made available to the public? These may be permitted discharges but their composition should be public information because public waters are involved.

Thanks for your time

Dennis Good President
Dark River Basin Association
E-mail; drba164@sytekcom.com

Fay, Lisa (DNR)

From: Mary Dosch <maryvineeta@gmail.com>
Sent: Sunday, September 02, 2012 4:12 PM
To: *Review, Environmental (DNR)
Subject: Minntac EAW

Dear Commissioner Landwehr, Ms. Fay:

I am deeply troubled by the fact that no E.I.S. has been prepared re. the proposed 483-acre expansion of U.S. Steel's Minntac Mine. As I understand it, Minntac's impacts have been degrading the environment for decades. I'm really worried about the serious harmful impacts that this 483-acre expansion will have on trout, on wild rice, and on the streams and wetlands in the St. Louis River watershed. Therefore, I respectfully urge you to INSIST that an E.I.S. BE PREPARED so that alternatives, specific mitigation plans and ways to minimize harm can be discussed. Also, the existence of an E.I.S. will result in disclosure of the potential impacts of another expansion of the Minntac mine and tailing basin.

Sincerely,
Mary Dosch
4365 Kingston Road
Duluth, MN 55803

--

"The eyes of the future are looking back at us and they are praying for us to see beyond our own time." -- By Terry Tempest Williams

Fay, Lisa (DNR)

From: Mary Dosch <maryvineeta@gmail.com>
Sent: Monday, September 03, 2012 8:59 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 "Western Pit Progression" at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel's long history of non-compliance, it is reasonable to expect that permits won't prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac's cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

In addition, I live in the St. Louis Watershed area and thus my own life will be personally impacted if Minntac's huge expansion is just allowed to proceed without an EIS. Again, thank you for holding Minntac accountable as discussed in the above paragraph.

Sincerely,

Mary Dosch
4365 Kingston Road
Duluth, MN 55803

Mary Dosch
4365 Kingston Road
Duluth, MN 55803

Townley, Jill (DNR)

From: Janet Draper <jntdraper@yahoo.com>
Sent: Monday, September 03, 2012 6:46 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Janet Draper
1825 Dunedin Ave.
Duluth, MN 55803

Townley, Jill (DNR)

From: Linda Duggleby <lindaduggleby@yahoo.com>
Sent: Thursday, August 30, 2012 1:47 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Linda Duggleby
5719 Holiday Road
Minnetonka, MN 55345

Townley, Jill (DNR)

From: James DuShane <andydushane@yahoo.com>
Sent: Thursday, August 30, 2012 3:13 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

James DuShane
936 8Th Ave S E
Rochester, MN 55904

Townley, Jill (DNR)

From: William Dustin <william.dustin@ethicofcitizenship.com>
Sent: Wednesday, September 05, 2012 2:13 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

William Dustin
7171 Mid Oaks Ave.
Stillwater, MN 55082

Townley, Jill (DNR)

From: Peter M Dziuk <plantstalker@gmail.com>
Sent: Monday, September 03, 2012 7:38 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Peter M Dziuk
1590 Long Lake Road
New Brighton, MN 55112

Townley, Jill (DNR)

From: lorraine erickson <lorraine.k.erickson@gmail.com>
Sent: Friday, August 31, 2012 11:32 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

lorraine erickson
109 n5th ave
virginia, MN 55792

Townley, Jill (DNR)

From: Garrett Ferderber <g.ferderber@gmail.com>
Sent: Thursday, August 30, 2012 1:43 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,
Garrett Ferderber

4021 11th Ave S
Minneapolis, MN 55407

Townley, Jill (DNR)

From: Mike Ferguson <draconiandruoid@gmail.com>
Sent: Saturday, September 01, 2012 1:48 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Mike Ferguson
100 Thomas Dr Apt 308
Mankato, MN 56001

Townley, Jill (DNR)

From: Barbara Finley-Shea <finleyshea@gmail.com>
Sent: Thursday, August 30, 2012 1:18 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Barbara Finley-Shea
P.O. Box 188
Lyle, MN 55953

BY EMAIL ONLY (environmentalrev.dnr@state.mn.us)

September 5, 2012

Lisa Fay, Planner Principal
Minnesota Department of Natural Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4032

Re: EAW Notice (EQB, Aug. 6, 2012): U.S. Steel—Minntac Mine Extension.

Dear Ms. Fay:

This letter constitutes the comments of the Fond du Lac Band of Lake Superior Chippewa and the Grand Portage Band of Lake Superior Chippewa (the "Bands") on the above project (the "Project"). Based upon the size of the Project, the lack of sufficient environmental review for the existing Minntac operation, and the current violations of the Clean Water Act ("CWA") at both the existing and proposed new operations, it is the Bands' position this Project must be treated as *new*, "major governmental action" with the "potential for significant environmental effects" within the meaning of the Minnesota Environmental Protection Act ("MEPA").¹ Therefore, a detailed environmental impact statement ("EIS"), as well as significant remediation and a new NPDES permit, are required before this Project can go forward.

The Bands are federally recognized Indian tribes and are member bands of the Minnesota Chippewa Tribe ("MCT"). Along with other MCT Bands, the Bands retain hunting, fishing, and other usufructuary rights that extend throughout the entire northeast portion of the state of Minnesota under the 1854 Treaty of LaPointe² (the "Ceded Territory"), which encompasses in the area of the Project.³ In the Ceded Territory, the MCT Bands have a legal interest in protecting natural resources, which are also treaty resources. Minnesota tribes have successfully sued to enforce off-reservation treaty rights⁴ and MCT Bands now jointly manage treaty resources within the Ceded Territory with the DNR.⁵ Any project within the Ceded Territory that has the potential to affect treaty resources, which includes any project that may affect air and water quality, fisheries, wildlife habitat, or other natural resources, requires notice to and consultation with the Bands.

¹ Minn. Stat. § 116D.04 subd. 2a.

² Treaty with the Chippewa, 1854, 10 Stat. 1109, in Charles J. Kappler, ed., *Indian Affairs: Laws and Treaties*, Vol. II (Washington: Government Printing Office, 1904), available on-line at <http://digital.library.okstate.edu/kappler/Vol2/treaties/chi0648.htm> (last visited Aug. 14, 2012).

³ See Map of 1854 Ceded Territory, attached at Ex. A.

⁴ See, e.g., *Minnesota v. Mille Lacs Band of Chippewa Indians*, 526 U.S. 172, 201-202 (1999).

⁵ See, e.g., DNR's 1854 Treaty page, available on-line at http://www.dnr.state.mn.us/aboutdnr/laws_treaties/1854/index.html (last visited Aug. 29, 2012).

Yet this EAW was prepared without any effort by the DNR to consult with the Bands, and it makes no reference whatsoever to the significant tribal interests this Project would impact. This contradicts explicit state policy. Former Governor Tim Pawlenty signed Executive Order 03-05 requiring that state agencies recognize that there is a government-to-government relationship between the state and Indian tribes.⁶ Furthermore, the state and its agencies should “consult with the governments of the affected Indian tribe or tribes regarding a State action or proposed action that is anticipated to directly affect an Indian tribe.”⁷ The failure to do this means that the EAW fails to take into account tribal interests in the area and significant technical data the Bands maintain relating to the area of the Project. Given that the Bands jointly manage Ceded Territory natural resources with the DNR, and the requirements throughout state and federal law to consult with tribes, it is difficult to understand why the DNR as RGU failed to involve the Bands from the start.

Additionally, here, the U.S. Army Corps of Engineers will issue a Section 404 permit, and presumably, the EPA will also be involved in the CWA review. All federal agencies share in the federal government’s trust responsibility to the Bands to maintain those treaty resources.⁸ Tribal consultation and full evaluation of treaty resources will also have to happen before either of those agencies can issue a permit.

Moreover, the Bands have Treatment-in-the-same-manner-As-a-State (“TAS”) status under the Clean Water Act for purposes of administering water quality standards (“WQS”), and are treated as a downstream regulators from the Project (and the state of Minnesota). To the extent that there is a dispute between the state and the Bands regarding whose WQS should apply to the Project, the Bands can seek recourse to the EPA to act as mediator between the two before issuance of any new NPDES permit, if ultimately required, as the Bands argue it must be.⁹

⁶ Exec. Order 03-05, <http://www.leg.mn/archive/execorders/03-05.pdf> (last visited Aug. 29, 2012).

⁷ *Id.*

⁸ See, e.g., Exec. Order 13175—Consultation and Coordination With Indian Tribal Governments (Nov. 6, 2000) (stating “the United States has recognized Indian tribes as domestic dependent nations under its protection . . .,” there is a “trust relationship with Indian tribes,” and “[a]gencies shall respect Indian tribal self-government and sovereignty, honor tribal treaty and other rights, and strive to meet the responsibilities that arise from the unique legal relationship between the Federal Government and Indian tribal governments.”), available at <http://ceq.hss.doe.gov/nepa/regs/eos/eo13175.html> (last visited Aug. 14, 2012). See also USACE Tribal Consultation Policy (Draft/Deliberative) (Jan. 2012), available at http://www.usace.army.mil/Portals/2/docs/civilworks/tribal/consult_policy_draft_jan2012.pdf (last visited Aug. 14, 2012).

⁹ 40 C.F.R. § 121.13. See also *Wisconsin v. EPA*, 266 F.3d 741, 748 (7th Cir. 2001) (“Once a tribe is given TAS status, it has the power to require upstream off-reservation dischargers, conducting activities that may be economically valuable to the state (e.g., zinc and copper mining), to make sure that their activities do not result in contamination of the downstream on-reservation waters (assuming for the sake of argument that the reservation standards agree more

I. Existing CWA violations at the Minntac site.

Since 2005, the Bands have been working cooperatively with the Minnesota Pollution Control Agency ("MPCA") and U.S. Steel, along with other MCT-member Band, Bois Forte, towards Minnesota Water Quality Standards ("WQS") compliance for the U.S. Steel Minntac mine tailings basins. We have good reason for our concern about past, present, and future natural resource impacts from Minntac's current operations and proposed Project.

This Project involves a 483-acre extension of its existing open pit mining facilities in Mountain Iron, with taconite produced from the extension to continue to be processed at the existing Minntac facility "at the current levels of production." But any expansion will unquestionably cause further degradation to waters with an existing water quality impairment, however, one that arises from Minntac's own operations, a matter the Bands' representatives have raised at numerous federal consultation sessions.

The Minntac tailings basin discharges to three watersheds, the Sandy, Dark, and West Two River Watersheds, through engineered seeps and also via groundwater discharges. But Minntac's tailings basin National Pollutant Discharge Elimination System ("NPDES") permit MN005249 expired July 31, 1992 and has been amended multiple times in violation of the CWA, despite ongoing violations. In fact, based on the content of the later SOCs, it appears that Minnesota WQS were even being violated *prior to* re-issuance of the permit in 1989. Discharging untreated tailings basin wastewater that contains concentrations of sulfate, chloride, fluoride, manganese, hardness and specific conductance, that exceed MN WQS are causing ongoing damage to the treaty-protected fisheries and wild rice resources in these watersheds, and an expansion will only increase this damage.

Minntac has been permitted to keep operating under a series of ineffective "Schedules of Compliance" ("SOCs"). Federal regulations provide that any permit must contain limits and conditions necessary to ensure compliance with all applicable water quality standards, especially where the state knows that a discharge will cause or contribute to an excursion of water quality standards.¹⁰ The means by which a violator can be brought into compliance is an SOC, or "an enforceable sequence of actions . . . leading to compliance with an effluent limitation . . ." ¹¹ Compliance schedules longer than one year must include interim requirements and dates for their achievement on at least an annual basis in the permit.¹² Compliance schedules may extend beyond the term of a permit, if this is done in a manner that is consistent with the CWA and EPA's regulations.¹³ The purpose is to accomplish the final effluent limitation "as soon as possible."¹⁴

stringent than those the state is imposing on the upstream entity.") (internal citations omitted). Minntac's NPDES permit for its existing operation expired in 1992.

¹⁰ 40 C.F.R. § 122.44(d).

¹¹ 33 U.S.C. § 1362(17).

¹² 40 C.F.R. § 122.47(a)(3).

¹³ 40 C.F.R. §§ 122.44 and 122.47.

¹⁴ 40 C.F.R. § 122.47(a)(1).

But as evidenced by the lack of any consequence for exceedence, neither the expired NPDES permit nor the string of SOCs contain adequate limits and in over 20 years, Minntac has been unable to comply with them anyway. And, to our knowledge, the MPCA has never imposed final water quality-based effluent limits ("WQBELs") to limit Minntac tailings basin pollutant loadings to impaired waters of the State.

The following summary just since 2000, drawn from MPCA records, illustrates how these SOCs have been solely a means of "kicking the can down the road" along with the other ways the company has sidestepped the CWA:

- In 2000, MPCA issued a letter of warning to Minntac for sulfate and specific conductance water quality violations from discharges at the facility.
- In 2001, the second SOC was entered into to develop information to complete a variance application for sulfate, specific conductance, hardness, and chloride.
- In 2003, a third SOC was signed to further study the Sulfate-reducing Packed-bed Bioreactor ("SPB") technology to reduce sulfate concentrations. Volume III of the Minntac NPDES permit application EIS, section A, page 5, subpart w, provided:

In its Response to Comments on the draft Environmental Impact Statement, the MPCA stated "the SPB is being tested for the effectiveness of removing sulfate from the wastewater and is a pilot project. If the technology proves to be ineffective, the MPCA will require the Company to choose another mitigation option from the SOC... The other technologies/process changes that are listed in the EIS scoping document were not fully assessed under the October 2003 Schedule of Compliance (SOC) because the company and MPCA agreed that they appeared to be more problematic from either a technical or financial feasibility standpoint. If at some point the SPB did not work out, the other 'shelved options' must be reconsidered.

The SPB was tested and found to be ineffective at removing the pollutants of concern. Yet no other method was either tested or implemented.

- In 2006, Minntac requested a NPDES permit re-issuance with a variance, but ultimately pulled the application, presumably due to the fact that it was clear the NPDES permit could not be re-issued without significant remediation of the existing degradation. The 2006 Minntac EIS identified the following impacts:
 - Seepage from the basin had increased the concentrations of pollutants in the Dark and Sandy Rivers.

- The Dark River already violated WQS for sulfates, hardness, conductance and manganese under certain flow regimes.
- Additionally, the Sandy River already violated WQS for sulfates, chlorides, hardness, and conductance. The cause of the violations appeared to be directly and exclusively related to the seepage and discharges from the Minntac tailings basin.
- Based on recent research, it was suspected that the presence of sulfates promoted the methylation of mercury. Due to sulfate releases and resulting high methylmercury concentrations downstream from the tailings basin seepage points, mercury content of fish in the system is increasing. Any additional releases into these watersheds will continue to further negatively impact the fishery resources, potentially adversely affecting the health of tribal members consuming fish.
- In 2007, a fourth SOC was signed that superseded the 2006 SOC, and was again implemented and subsequently amended. Yet, the 2007 SOC *again* discussed SPB technology as a possibility, and discussed water modeling and water management as potential “solutions” prior to the company requesting a variance. This was after the Bands suggested in 2006 to the MPCA and to U.S. Steel that mining companies in western States have successfully employed reverse osmosis/nano-filtration to comply with WQS.
- In 2008, U.S. Steel sent MPCA an application for a reverse osmosis/nano-filtration wastewater treatment plant. But in 2009, according to MPCA staff, U.S. Steel requested from MPCA that their application for a reverse osmosis/nano-filtration wastewater treatment plant be pulled from consideration.
- In 2010, a barrier was installed between the tailings basin and the Sandy River which reduced the amount of polluted water reaching the Sandy River, but has not resulted in compliance with either state surface water or groundwater quality standards.

The following rates of exceedence are drawn from the MPCA’s records and illustrate the true effect of the existing violations:

Year of Operation	Excess Pounds of Sulfate	Excess Pounds of Hardness
2006	80,847	0
2007	69,839	241,167
2008	54,904	352,125
2009	18,207	31,133
2010	57,558	741,468

These CWA violations must be addressed before any expansion can be permitted. Federal precedent states that any new discharges that would result in further degradation to waters with an existing water quality impairment are *not* legally permitable under the CWA.¹⁵ That Minntac operates under an *expired* NPDES permit that has been constantly “extended” through the use of SOCs and illegal amendments, which it continually violates, does not distinguish this from cases where a *new* permit is denied on the same basis. In any case, a full EIS is required, including detailed analysis of these violations and a plan for full remediation, before this Project can go forward.

II. The EAW fails to adequately evaluate impacts to water resources.

But the EAW makes *nearly no mention* of these violations, instead asserting without any support that no additional impacts are expected and that there is “ongoing” research into existing sulfate discharges.

- Direct wetland and stream impacts have been discussed, but indirect impacts such as drawdown and inundation with polluted waters have been omitted. Mitigation ratios for direct impacts are discussed but no actual mitigation plans have been provided.
- Private drinking water wells have been identified in the vicinity of the proposed mine pit extensions and the possibility of draw down briefly discussed as an unknown potential impact of the project. Impacts to potable water due to groundwater contamination are not evaluated.
- It is indicated that the West Pit would eventually fill and outflow to the West Branch of the West Two Rivers without discussing impacts of the outflow due to polluted water from in-pit stockpiling or discussion of existing MN WQS violations. Page 29 states “[I]ncreased in-pit disposal may result in runoff, and therefore mine sump dewatering discharges, with elevated concentrations of certain dissolved constituents (e.g., sulfate, hardness, alkalinity, chloride). This could result in an increase of these constituents in downstream receiving waters...”
- The current rate of water discharge averages 20.5 MGD with an expected 5% increase due to this extension. Water consumption and inter-basin water transfer far exceeds the Great Lakes Charter of 1985 that states: “[T]he purposes of this charter are to conserve the levels and flows of the Great Lakes and their tributary and connecting waters...[T]he principle of prior notice and consultation will apply to any new or increased diversion or consumptive use of the water resources of the Great Lakes Basin which exceeds

¹⁵ See *Friends of Pinto Creek v. E.P.A.*, 504 F.3d 1007, 1013-14 (9th Cir. 2007) (mining company was not entitled to NPDES permit under CWA in connection with new copper mine, even though permit was conditioned on company partially remediating discharge from another mine, because creek was already impaired by excess of copper pollutant, permit allowed company to discharge additional amounts of dissolved copper into creek, and there was no indication of any compliance schedule that would bring creek within water quality standards.)

5,000,000 gallons per day average in any 30-day period. Minntac exceeds the 5 MGD consumptive use required for notice, consultation and approval of all of the Great Lakes States Governors, and cannot be "grandfathered in" using a 2003 water appropriations permit. There is no discussion regarding consultation and approval that must be sought before any expected increase can occur.

- On Page 29 there is a brief discussion regarding the seepage barrier that was installed to prevent polluted tailings basin water from reaching the Sand River and potentially building a similar system to prevent the same seepage from reaching the Dark River. There is no mention that the reductions of sulfate resulting from barrier installation are not enough to cause compliance with MN WQS, or if any other measures under consideration would result in compliance with MN WQS in either the Sand River or the Dark River. And, there is no mention of the 200 acres of wild rice that has already been destroyed by Minntac tailings basin seepage.
- Existing groundwater contamination is not discussed in the EAW. The EAW indicates that MPCA's "Groundwater Contamination Susceptibility in Minnesota" map identifies the project as having Low Susceptibility. Yet the groundwater around the tailings basin is known by both Minntac and MPCA to be contaminated by Minntacs operations.

III. Both the existing and planned Minntac operations damage treaty-protected fisheries and wild rice habitats.

As noted, these are not only violations of the CWA, but they cause impermissible damage to the Bands' treaty resources. The EAW makes no mention of these interests. Releases of high concentrations of sulfates, chlorides, hardness, and conductance from permitted seeps, and the dilution and discharge of tailings basin waters has and is likely to continue to damage at least two treaty resources in the Sandy, Dark, and West Two River watersheds: fisheries and wild rice.

As for the fisheries directly connected to and continually affected by the Minntac operations, releases into the Sandy River watershed flow into the Pike River and eventually into Pike Bay of Lake Vermilion. Pike Bay is used extensively as a fishery by tribal members. Pike Bay also provides critical fish spawning habitat and is home to a walleye spawn collection facility. A portion of the Dark River is a designated trout stream, and it appears that releases of tailings basin waters through permitted seeps to this watershed could have significant impacts on the trout population. Permitting more discharges of diluted tailings basin waters to the West Two River will also likely cause an increase in the concentrations of sulfates to both the West Two River and portions of the St. Louis River, potentially impacting fisheries used by tribal members.

Sampling conducted by Fond du Lac in 2006 at various points along the West Two River found high concentrations of sulfates near the Minntac facility with a gradient of reduced concentrations further away from the facility. Likewise, concentrations of chloride, conductance, and total suspended solids all decreased the further downstream the sampling points were from the facility. Based on recent research, it is unquestionable that the presence of

sulfates promotes the methylation of mercury. Sampling conducted by MPCA as early as 2001 showed relatively high concentrations of methylmercury in the Sandy and Pike rivers. The St. Louis River is impaired throughout its entire watershed for mercury in fish, and is the subject of a toxics TMDL study to address sources and mechanisms for reductions. Due to sulfate releases and resulting high methylmercury concentrations downstream from existing tailings basin seepage points, mercury content of fish in all of the receiving watersheds is likely increasing. Any additional releases into these watersheds will further negatively impact the fishery resources, potentially affecting the health of tribal members consuming fish. This impact must be evaluated in an EIS and Minntac must mitigate and correct these ongoing impacts to the Bands' treaty resources.

Second, wild rice is a culturally significant resource for the tribes in northeastern Minnesota. From historical reports and Band member accounts, wild rice has declined significantly in Sandy and Little Sandy Lakes (the "Twin Lakes") since the late 1960s or early 1970s. In 1989, there were more than 200 acres of wild rice in the Twin Lakes. Evidence points to changes in water quality as the leading factor of decline. Again, releases from Minntac operations are suspected as the primary cause. Based on MPCA's recent water depth analysis for wild rice, water levels are still suitable for wild rice growth. Survey work conducted by the 1854 Treaty Authority and Fond du Lac in multiple years between 2003 and 2011 found several good stands of wild rice remaining in the Pike River. Additional sulfate releases into the Sandy and Pike River watersheds will likely further deplete wild rice stands. This impact, too, must be evaluated in an EIS, along with proper mitigation.

IV. Additional deficits in the EAW.


The following areas, among others, also require significant additional information which can only be accomplished through an EIS:

- Sec. 8, *Permits and approvals required* (pgs. 6-7). This section makes no reference to the required Section 106 consultation with the Bands under the National Historic Preservation Act or the need for EPA approval of a current NPDES permit.
- Sec. 11, *Fish, wildlife and ecologically sensitive resources* (pgs. 11-16). This section makes no reference to wild rice and sturgeon, both species of exceptional cultural significance to the Bands, and which exhibit sensitivity to high-sulfate waters.
- Sec. 25, *Nearby resources*, Archaeological, historical or architectural resources (pages 40-42). This section reflects no consultation with the Bands' Tribal Historic Preservation Offices ("THPOs"), and no recognition of any tribal historic sites, only with the State Historic Preservation Office in addition to a literature search. Likewise, the Bands have not been invited to participate in the USACE-SHPO Programmatic Agreement for historic review. See pg. 7.

Please let us know of questions. Thank you.


L.Fay
September 5, 2012
Page 9

FOND DU LAC BAND OF LAKE
SUPERIOR CHIPPEWA



Nancy Schuldy, Water Projects Coordinator

GRAND PORTAGE BAND OF LAKE
SUPERIOR CHIPPEWA



Margaret Watkins, Water Quality Specialist

c: Tamara Cameron, USACE
Ken Westlake, EPA Region 5
Kevin Pierard, EPA Region 5
Linda Holst, EPA Region 5

Townley, Jill (DNR)

From: Sharon Fortunak <srf7120@msn.com>
Sent: Thursday, August 30, 2012 1:47 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Sharon Fortunak
7120 Ivystone Ave So
Cottage Grove, MN 55016

Townley, Jill (DNR)

From: Jane Fosse <rfosse@comcast.net>
Sent: Tuesday, September 04, 2012 7:55 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Jane Fosse
1161 Lealand Rd.
Maplewood, MN 55109

Townley, Jill (DNR)

From: Rosemary Foutts <mountainrose13@yahoo.com>
Sent: Thursday, August 30, 2012 1:49 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Rosemary Foutts
2224 Skillman Avenue East
North Saint Paul, MN 55109

Townley, Jill (DNR)

From: Christine Frank <christinefrank@visi.com>
Sent: Friday, August 31, 2012 3:26 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Christine Frank
115 2nd Ave S #714
Minneapolis, MN 55401

Fay, Lisa (DNR)

From: Madelynn Frazier <madelynnf48@sbcglobal.net>
Sent: Thursday, August 30, 2012 2:01 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

More needs to be known of the impact to wildlife, water and other ecological concerns BEFORE this company is allowed to expand its mining.

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Madelynn Frazier
1826 E. Woodbine St.
Springfield, MO 65803

Townley, Jill (DNR)

From: Amy Gardner <ourkaya1@gmail.com>
Sent: Thursday, August 30, 2012 6:55 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Amy Gardner
PO Box 446
Finland, MN 55603

Townley, Jill (DNR)

From: Annie Gardner <ajgardner@stthomas.edu>
Sent: Thursday, August 30, 2012 10:10 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Annie Gardner
1906 1st Ave S
Minneapolis, MN 55403

Townley, Jill (DNR)

From: Nancy Giguere <nancygiguere@visi.com>
Sent: Wednesday, September 05, 2012 2:50 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Nancy Giguere
1471 Edmund Ave
St Paul, MN, MN 55104

Townley, Jill (DNR)

From: Mark Good <marcotgood@gmail.com>
Sent: Friday, August 31, 2012 8:52 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Mark Good
98 Linnell Rd.
Grand Marais, MN 55604

Townley, Jill (DNR)

From: William Goshert <wgoshert@msn.com>
Sent: Thursday, August 30, 2012 3:03 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

William Goshert
1528 Pascal Street North
Saint Paul, MN 55108

Fay, Lisa (DNR)

From: Cynthia Goss <cyngemail-news@yahoo.com>
Sent: Tuesday, September 04, 2012 9:38 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion. This proposal is much too large and an EIS should be mandatory.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Cynthia Goss
8949 Columbus Ave S
Bloomington, MN 55420

Townley, Jill (DNR)

From: C Goustin <ski2thegoddess@aol.com>
Sent: Thursday, August 30, 2012 6:08 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

C Goustin
817 N 23rd Ave W
Duluth, MN 55806

Townley, Jill (DNR)

From: Jan Greenfield <jan.greenfield@mac.com>
Sent: Friday, August 31, 2012 3:41 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jan Greenfield
Rome Ave.
St. Paul, MN 55116

Townley, Jill (DNR)

From: Bernard Grisez <bgzr42@mm.com>
Sent: Thursday, August 30, 2012 3:15 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Bernard Grisez
2908 Old Highway 8
St Anthony Village, MN 55418

Townley, Jill (DNR)

From: Carly Gutzmann <cngutzmann@gmail.com>
Sent: Thursday, August 30, 2012 3:00 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
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- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Carly Gutzmann
Hapner Hall
Bozeman, MT 55123

Townley, Jill (DNR)

From: chris haenisch <haenisch024@gmail.com>
Sent: Thursday, August 30, 2012 6:42 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

chris haenisch
505 54th ave ne
fridley, MN 55421

Townley, Jill (DNR)

From: Allan Hancock <3rdcdgreenparty@gmail.com>
Sent: Friday, August 31, 2012 8:16 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Allan Hancock
5520 Fremont Ave N
Brooklyn Center, MN 55430

Townley, Jill (DNR)

From: Blanche Hawkins <Whitebearblanche@aol.com>
Sent: Wednesday, September 05, 2012 2:44 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Blanche Hawkins
126 dellwood
Dellwood, MN 55110

Fay, Lisa (DNR)

From: Ellen Hawkins <eehawkins22@gmail.com>
Sent: Friday, August 31, 2012 9:11 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr and Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

I'm surprised you would even consider treating this so casually - and so irresponsibly - when you want us to believe Minnesota can manage the sulfide mining projects pounding on our door. It seems that even if you don't care about impacts to the environment, you would want to look as though you are serious about wise management of our water resources.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice; private wells, and watersheds.

Sincerely,

Ellen Hawkins

Ellen Hawkins
163 Pancore Lake Road
Tofte, MN 55615

Fay, Lisa (DNR)

From: Chris Heeter <chris@thewildinstitute.com>
Sent: Wednesday, September 05, 2012 4:23 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I'm back early from the wild rice harvest--the conditions were so poor that we did not even rice. First time in 20 years to have simply given up on the season completely. Yes, there are environmental factors at play here. My hope is that, given all else that the rice--and so many many other environmental concerns--is contending with regarding our climate, that we tread very carefully and lightly into this world of inviting more stress on precious resources.

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 "Western Pit Progression" at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Chris Heeter

Chris Heeter
16401 Buchanan St NE
Ham Lake, MN 55304

Townley, Jill (DNR)

From: K Helms <herbsthelms@hotmail.com>
Sent: Thursday, August 30, 2012 8:05 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

K Helms
private
Mankato, MN 56001

Townley, Jill (DNR)

From: Brian Henning <bhenning2200@gmail.com>
Sent: Thursday, August 30, 2012 2:36 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Brian Henning
2200 Dixon Drive
Bloomington, MN 55431

Townley, Jill (DNR)

From: William Herzberg <xanadu.rex.phuong@gmail.com>
Sent: Thursday, August 30, 2012 1:58 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

William Herzberg
6971 Cramer rd
Finland, MN 55603

Townley, Jill (DNR)

From: Jamie Hoerter <jamie_hoerter@yahoo.com>
Sent: Sunday, September 02, 2012 8:18 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jamie Hoerter
502 6th St SW
Austin, MN 55912

Townley, Jill (DNR)

From: Christine Hoffman <parasiempremorado@yahoo.com>
Sent: Monday, September 03, 2012 2:32 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Christine Hoffman
950 Country Road 88 SW
Alexandria, MN 56267

Townley, Jill (DNR)

From: Kristin Holloway <kristin.holloway12@yahoo.com>
Sent: Saturday, September 01, 2012 6:56 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Kristin Holloway
11836 300th Avenue
Princeton, MN 55371

Townley, Jill (DNR)

From: jason husby <jcobainfan@aol.com>
Sent: Friday, August 31, 2012 5:58 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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Sincerely,

jason husby
3531 3rd st n
minneapolis, MN 55412

Townley, Jill (DNR)

From: Jay Hutchinson <hutch5440@gmail.com>
Sent: Thursday, August 30, 2012 1:15 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jay Hutchinson
1841 Simpson St.
St. Paul,, MN 55113

Fay, Lisa (DNR)

From: dkrirish@mchsi.com
Sent: Wednesday, September 05, 2012 11:33 AM
To: Fay, Lisa (DNR)
Subject: Minntac EAW

My name is Dale Irish and I reside at 5425 Mineral Ave, Mountain Iron, MN 55768. I have a few comments regarding the Minntac Mine extension project and the prepared EAW: First I would like to know what buffer effect this project will have on the property I also own at 5682 Nichols Avenue in northern Parkville that borders the Extended Reserve Limits. Second is my concern with the Parkville Creek which at one time was a natural flowing creek originating from the Laurention Divide water shed and now will be used for dewatering with varying water levels. There are three Beaver Ponds with-in the Parkville Creek and a large tract of wetlands nearby my residence at 5425 Mineral Avenue, as it enters the West Two Rivers Reservoir, that will greatly be effected with any fluctuation of water levels. One major concern is from past problems with Blastomycosis at record levels in this area possibly from this vary same water shed when studies were conducted during the outbreak. Third I would like to comment on the loss of approximately 7 miles of ATV trails with-in this proposed area. These ATV trails are mapped and included in the DNR inventoried trail system. These trails are used by both ATV and snowmobile enthusiast as a though-way connecting the east and west Iron Range and should be replaced alongside the proposed new County Road 102 Relocation. Finally I believe a more conservative approach should be used and all the lands should be turned over for control by Minntac except on an as needed bases. I like the Extended Reserve buffer of 78 acres, instead of all the 483 acres, which most will not get mined, due to use as a buffer zone. Thank You Dale Irish

Townley, Jill (DNR)

From: Ann Jalonen <annjalonen@hotmail.com>
Sent: Monday, September 03, 2012 7:19 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Ann Jalonen
105 University Ave. W.
Saint Paul, MN 55103

Townley, Jill (DNR)

From: Bob Jalonen <jalonen@frontiernet.net>
Sent: Friday, August 31, 2012 1:57 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Bob Jalonen
189 Sunset Road
Ely, MN 55731

Townley, Jill (DNR)

From: F Emil Jalonen <ejalonen@aol.com>
Sent: Friday, August 31, 2012 10:19 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

F Emil Jalonen
1880 Orchard Lane
White Bear Lake, MN 55110

Fay, Lisa (DNR)

From: Jason Janisch <jdjanisch@jaspereng.com>
Sent: Monday, August 06, 2012 4:01 PM
To: *Review, Environmental (DNR)
Subject: MinnTac EAW

I support U.S. Steel's responsible efforts in expanding their mine and extending the mine life of MinnTac. The engineers and scientist of U.S. Steel are some of the most dedicated professionals in the industry when it comes to environmental responsibility in mining. The world would be better off if globally all mining was conducted as well.

Best regards,

Jason Janisch
Jasper Engineering
(218) 969-4875

Townley, Jill (DNR)

From: Geraldine Jensen <geri_jensen@hotmail.com>
Sent: Tuesday, September 04, 2012 2:55 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Geraldine Jensen
P.O.Box 908
Grand Marais, MN 55604

Townley, Jill (DNR)

From: Jeanne Jensen <sasha0395@gmail.com>
Sent: Thursday, August 30, 2012 4:12 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jeanne Jensen
41 Beech Ct.
Babbitt, MN 55706

Townley, Jill (DNR)

From: Lowell Johnson <johnsonlowell@clearwire.net>
Sent: Wednesday, September 05, 2012 1:21 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Lowell Johnson
Fort Ripley MN

Lowell Johnson
4441 20th St

Townley, Jill (DNR)

From: Matt Johnson <m.johnson4234@gmail.com>
Sent: Wednesday, September 05, 2012 12:38 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Matt Johnson
2318 Aldrich Ave S #2
Minneapolis, MN 55405

Townley, Jill (DNR)

From: Dale Johnston <dkjohnston7@mac.com>
Sent: Thursday, August 30, 2012 1:47 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Dale Johnston
14615 Oakwood Road
Minnetonka, MN 55345

Townley, Jill (DNR)

From: Kathleen Jones <bmustangs9@aol.com>
Sent: Thursday, August 30, 2012 4:53 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Kathleen Jones
469 Ferndale Woods Road
Wayzata, MN 55391

Townley, Jill (DNR)

From: Mary Ellen Kaluza <mek7722@gmail.com>
Sent: Friday, August 31, 2012 6:07 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Mary Ellen Kaluza
2115 12th Ave S
Minneapolis, MN 55404

5639 Eagle Ave.
Mountain Iron, MN 55768
August 17, 2012

Lisa Fay
DNR Ecological and Water Resources Division
500 Lafayette Road
St. Paul, MN 55155-4025

Dear Ms. Fay,

Having reviewed the recent Minntac Mine Extension proposal and especially the accompanying maps, we are writing to voice our concerns about water quality and mine runoff should the mining extension be approved.

We live just a block south of Parkville Road and just west of the area designated on the map as a portion of the National Wetlands Inventory. That wetlands area borders Highway 53 on the east and in fact is just dozens of feet east of the property we own on Eagle Ave.

Of particular concern to us is a small creek which runs under Parkville Road – at various times called Mud Creek and a drainage ditch – which meanders through Parkville and under Highway 169 to the south to an area designated on Figure 4B as East Two River. We were aware when we bought our property nearly 20 years ago that beaver inhabit the wetlands area, and that over the years various methods of have ^{been} used to eliminate the flooding their dams have caused, particularly in springtime.

This spring and early summer, however, the potential for flooding – despite road improvements on Parkville Road – seemed to grow daily as we watched waters rise in the wetlands area and threaten to go over the nearby Mesabi Trail and potentially Parkville Road. Our concern at that time was the possibility that flooding would go unchecked and that eventually the water level would overwhelm our sump pump's ability to handle it.

We discussed the problem with the office of our county commissioner, which led us to a phone call from the area county garage manager, who informed us the county has no jurisdiction over the creek. We were led in the direction of the DNR, who sent a representative to view the area and initiate any appropriate action. To date it is our assumption that the DNR is working with the City of Mountain Iron to keep the creek dredged on a semi-regular basis in order for the flooding potential to be eased.

We note that Minntac's Mine Extension proposal includes expanding their east pit into an area to our north, now much higher ground than either the wetlands or our homes to the south of the proposed expansion. We question where runoff from mining operations in this area would go – into the wetlands area? The area appears to be in delicate balance already due to other wetland areas to the north and east as well as the beavers' natural dam-building activities.

We appreciate our concerns being noted as part of the public comment to Minntac's Mine Extension proposal.

Sincerely,

Louis & Mary Karakash

Louis and Mary Karakash

Townley, Jill (DNR)

From: Jan Karon <jskaron@chartermi.net>
Sent: Thursday, August 30, 2012 10:05 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jan Karon
1112 S. Lake Avenue
Duluth, MN 55802

Townley, Jill (DNR)

From: mark kassal <markkassal@gmail.com>
Sent: Thursday, August 30, 2012 3:59 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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Sincerely,

mark kassal
3977 swanson shores rd
ely, MN 55731

Townley, Jill (DNR)

From: Ryan Kelley <ryanpkelley@hotmail.com>
Sent: Saturday, September 01, 2012 10:12 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Ryan Kelley
Murphy Parkway
Saint Paul, MN 55122

Townley, Jill (DNR)

From: Mike Kemper <secndgear@gmail.com>
Sent: Friday, August 31, 2012 2:12 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Mike Kemper
2242 Matterhorn Ln.
Saint Paul, MN 55119

Townley, Jill (DNR)

From: Joan Knuttila <rknuttila@gmail.com>
Sent: Thursday, August 30, 2012 1:28 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Joan Knuttila
17450 Gettysburg Way
Lakeville, MN 55044

Fay, Lisa (DNR)

From: Jane Koschak <janekoschak@gmail.com>
Sent: Tuesday, September 04, 2012 11:24 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I live in Stony River Township on Birch Lake and the South Kawishiwi River, just 10 minutes from Ely Minnesota. My husband, Steve and I met with you, Commissioner Landwehr, a few times...the last being at the Capitol when Representative Alice Hausman hosted a forum with you and Paul Aasen in attendance, along with several other citizens and residents of northern Minnesota who share deep concerns related to, not only the possible onset of sulfide metal mining, but the dire environmental consequences of iron and taconite mining.

We have owned River Point Resort & Outfitting Co. for the past 36 years, and are most concerned with the onslaught of environmental degradation caused by the mining industry. Less than two weeks ago, the haze over Birch Lake and the BWCA, as a result of the spewing of dust and debris from the six operating taconite plants caused our guests to ask what in the world is going on with the air quality....it used to be that we could see for miles and miles? Air quality was horrendous for many days running, and a definite haze was apparent to all of our guests. They have enough of that in the large cities that they are from. They come to northern Minnesota to breathe fresh air and to view the abundant natural beauty. To have it shrouded in taconite dust is a disgrace.

Obviously, as expressed to you previously, Dunka Pit is a huge source of water pollution running into Birch Lake and into the entire Kawishiwi watershed. The rains and high water levels for all of June caused an incredibly amount of acid mine drainage to flow even more freely from the mess left at Dunka by the taconite mining industry. We also have some very abundant stands of wild rice on Birch, whose life span is limited, at best.

I am urgently requesting that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

Because I have observed first-hand what has occurred on Birch Lake over the past several decades, as a direct result of taconite mining, I know that Minntac has seriously destroyed the quality of water in the Lake Superior Basin due to continual violations of their permits, and a lack of regulation enforcement. This can not be allowed to continue.

For expansion of Minntac is unrelenting, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 "Western Pit Progression" at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.

- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel's long history of non-compliance, it is reasonable to expect that permits won't prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac's cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. The public needs to be directly involved and has the right to give comments to a EIS. All of this must and should be publicly transparent.

This is a high alert time in Minnesota. Minntac, and all taconite plants, must be held accountable for the damage already incurred to our environment, and to minimize and reduce the destruction to streams, wetlands, fish, wild rice, private wells, and watersheds. Protection and conservation of our environment, including air quality and water quality, are essential to the economy of Minnesota, including the tourism industry, and to our human health.

I would like to summarize very briefly with a quote from Ken Salazar, the secretary of the US Department of the Interior from the August 24, 2012 edition of Outdoor News:

The people who want to cut spending on conservation are "missing the boat," Salazar said. "They don't understand that conservation and economics and quality of life and job creation are the same thing."

Sincerely,

Jane Koschak
PO Box 397
Ely, MN 55731

Townley, Jill (DNR)

From: Robert Kosuth <rkosuth@hotmail.com>
Sent: Friday, August 31, 2012 10:40 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Robert Kosuth
1224 E. 11th Street
Duluth, MN 55805

Townley, Jill (DNR)

From: Lawrence Krantz <lkrantz@spamcop.net>
Sent: Monday, September 03, 2012 10:49 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Lawrence Krantz
9180 Goodnuff Ln NE
Bemidji, MN 56601

Townley, Jill (DNR)

From: Martha Krikava <krikava.family@me.com>
Sent: Thursday, August 30, 2012 10:00 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Martha Krikava
9696 101st St N
Grant, MN 55082

Townley, Jill (DNR)

From: Karen Laakaniemi RNC,MSN <klaakan@frontiernet.net>
Sent: Thursday, August 30, 2012 7:26 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Karen Laakaniemi RNC,MSN
1170 Hidden Creek Blvd
MAYER, MN 55360

Townley, Jill (DNR)

From: Andrea Lambrecht <andreal@umn.edu>
Sent: Thursday, August 30, 2012 2:50 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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Sincerely,

Andrea Lambrecht
3117 Roosevelt St NE
St. Anthony, MN 55418

Fay, Lisa (DNR)

From: Colles Larkin <fiend4art@gmail.com>
Sent: Monday, September 03, 2012 1:45 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I can't believe the Minnesota Department of Natural Resources would move to grant Minntac's request for increasing its mining lands by 483 acres without first requiring an EIS. This is unconscionable, especially since Minntac's record of environmental oversight borders on the illegal.

It is my understanding that the MDNR's first mission is to protect and guard our natural resources so that generations following will enjoy good health. Minntac has a history, apparently, of willfully disregarding regulations, adding sulfates to our streams and wetlands. Sulfates are toxic and have a cumulative effect.

Water is not a constantly renewable resource. With weather changes droughts are occurring worldwide more frequently. The non-therapeutic use of antibiotics by our meat producers contaminate our water systems; the new "silver bullet" of fracking combines unspecified chemical toxins with huge amounts of water, which is then contaminated.

The mining industry in this country has a history of non-observance of safety & health oriented regulations. Therefore it is incumbent upon the citizens to see that our government offices protect the natural resources we still have. Water is the most important of these.

An EIS should be a first requirement of any mining endeavor.

Please use your authority to help the citizens steward their land, waters and air. There is nothing more important. Thank you.

Sincerely,
Colles Larkin

Colles Larkin
7 Yellow Birch Rd
White Bear Lake, MN 55110

Townley, Jill (DNR)

From: Elizabeth LePlatt <eBetsy@msn.com>
Sent: Monday, September 03, 2012 4:25 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Elizabeth LePlatt
7012 Cheyenne Trail
Chanassen, MN 55317

Townley, Jill (DNR)

From: Kathy Lindbloom <kjlindbloom57@yahoo.com>
Sent: Thursday, August 30, 2012 1:41 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Kathy Lindbloom
617 Ridgewood Lane
Delano, MN 55328

Townley, Jill (DNR)

From: Christopher Loch <christopherloch@hotmail.com>
Sent: Thursday, August 30, 2012 4:09 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Christopher Loch
2410 Garfield Avenue South #303
Minneapolis, MN 55405

Townley, Jill (DNR)

From: Donelle Londgren <donellymae@gmail.com>
Sent: Thursday, August 30, 2012 2:38 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Donelle Londgren
Onigum Rd NW
Walker, MN 56484

Townley, Jill (DNR)

From: Mike Long <brownbear74@gmail.com>
Sent: Thursday, August 30, 2012 1:19 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Mike Long
1720 East 50th St.
Minneapolis, MN 55417

Townley, Jill (DNR)

From: Carlen Lovejoy <carlen.lovejoy@gmail.com>
Sent: Tuesday, September 04, 2012 9:36 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Carlen Lovejoy
8935 Old Cedar Ave S Apt 304
Bloomington, MN 55425

Townley, Jill (DNR)

From: June Macy <junie49@msn.com>
Sent: Thursday, August 30, 2012 2:30 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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Sincerely,

June Macy
3505 Meadow Lane
Minnetonka, MN 55345

Townley, Jill (DNR)

From: Sharon Magliulo <smagliulo55731@yahoo.com>
Sent: Thursday, August 30, 2012 1:51 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Sharon Magliulo
821 E. Pattison St.
Ely, MN 55731

Townley, Jill (DNR)

From: Martin Makinen <mmakinen754@netscape.com>
Sent: Saturday, September 01, 2012 11:13 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Martin Makinen
12125 Kenyon Ct. NE
Blaine, MN 55449

Townley, Jill (DNR)

From: Cathy Maloney-Hills <cathymhills@msn.com>
Sent: Thursday, August 30, 2012 9:43 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Cathy Maloney-Hills
8942 York Rd
Bloomington, MN 55431

Townley, Jill (DNR)

From: Jim Malwitz <jmalwitz@comcast.net>
Sent: Thursday, August 30, 2012 8:48 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jim Malwitz
4137 Bridgewater Cir
Vadnais Heights, MN 55127

Townley, Jill (DNR)

From: Richard Mammel <mudman0007@gmail.com>
Sent: Thursday, August 30, 2012 6:22 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Richard Mammel
1209 Birch hill Dr.
Albert Lea, MN 56007

Townley, Jill (DNR)

From: Gordon Manary <gmanary@yahoo.com>
Sent: Friday, August 31, 2012 7:14 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Gordon Manary
1416 89th Ave. W.
Duluth, MN 55808

Townley, Jill (DNR)

From: Kristine Mandel <riskri@hotmail.com>
Sent: Saturday, September 01, 2012 6:57 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Kristine Mandel
3724 Cedar Ave S
Minneapolis, MN 55407

Townley, Jill (DNR)

From: Ann Marie <annie.sunderland@co.dakota.mn.us>
Sent: Friday, August 31, 2012 9:41 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Ann Marie
15555 Flight Way
St Paul, MN 55124

Townley, Jill (DNR)

From: Virginia Martin <marti137@tc.umn.edu>
Sent: Thursday, August 30, 2012 2:46 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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Sincerely,

Virginia Martin
695 Hague Ave
Saint Paul, MN 55104

Townley, Jill (DNR)

From: Jeffrey Masco <jcm55406@comcast.net>
Sent: Thursday, August 30, 2012 1:05 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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Sincerely,

Jeffrey Masco
2720 40 Ave. S.
2720 40th Ave. S.

Minneapolis, MN 55406

Townley, Jill (DNR)

From: Harriet McCleary <mcCleary@stolaf.edu>
Sent: Thursday, August 30, 2012 3:51 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Harriet McCleary
2440 Stevens Ave. S. #2
Minneapolis, MN 55404

Townley, Jill (DNR)

From: Sarah McLarnan <sarahmclarnan@hotmail.com>
Sent: Thursday, August 30, 2012 2:25 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Sarah McLarnan
8130 Trillium Circle
Victoria, MN 55386

Fay, Lisa (DNR)

From: Kathleen McQuillan <mcquillk@yahoo.com>
Sent: Friday, August 31, 2012 7:44 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

As a wild rice harvester for years and a lover of fishing, I have watched the decline of local rice beds and favorite fishing lakes in the vicinity of Minntac operations. An EIS should absolutely be done for any further proposed expansions!

Sincerely,

Kathleen McQuillan
10816 Plum Creek Road
Cook, MN 55723

Fay, Lisa (DNR)

From: Martha Megarry <mega0015@umn.edu>
Sent: Thursday, August 30, 2012 1:40 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

Our water is not just an issue for environmentalists or conservationists or people who have signed on to the 'green' movement. It is not just important to nature and other species. Water is essential to our survival. The impact of the Minntac mine doesn't only affect the land directly around it. It has far reaching consequences that we haven't even discovered yet for everyone in Minnesota.

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 "Western Pit Progression" at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel's long history of non-compliance, it is reasonable to expect that permits won't prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac's cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Martha Megarry
3641 Bryant Ave S
Minneapolis, MN 55409

Townley, Jill (DNR)

From: Karl Meller <krlmeller@yahoo.com>
Sent: Saturday, September 01, 2012 12:49 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Karl Meller
1816 Stevens
mpls, MN 55403

Townley, Jill (DNR)

From: Elizabeth Merz <merz@prtcl.com>
Sent: Monday, September 03, 2012 11:16 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Elizabeth Merz
111 W. Lincoln Ave., #305
Fergus Falls, MN 56537

Townley, Jill (DNR)

From: Connie Metcalf <cjmet@tcq.net>
Sent: Tuesday, September 04, 2012 12:34 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Connie Metcalf
802 Mendenhall Ave
Breckenridge, MN 56520

Fay, Lisa (DNR)

From: saraphine metis <cathouse@boreal.org>
Sent: Friday, August 31, 2012 1:03 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 "Western Pit Progression" at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel's long history of non-compliance, it is reasonable to expect that permits won't prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac's cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

I AM AWARE THAT NORTHERN MINNESOTA NEEDS GOOD JOBS, BUT THEY SHOULD NOT COME AT THE EXPENSE OF THE ONLY ENVIRONMENT WE HAVE.

Sincerely,

saraphine metis
13 cnty rd 6
grand marais, MN 55604



Minnesota Center for Environmental Advocacy

26 East Exchange Street • Suite 206 • Saint Paul, MN 55101-1667 • (651) 223-5969

September 5, 2012.

VIA U.S. AND
ELECTRONIC MAIL

Lisa Fay
Planner Principal State
500 Lafayette Road, Box 32
St. Paul, MN 55155-4032

Re: *Draft Environmental Assessment Worksheet for the proposed Minntac Mine Extension*

Dear Ms. Fay,

I write to provide the comments of Minnesota Center for Environmental Advocacy on the Draft Environmental Assessment Worksheet for the proposed Minntac Mine Extension. MCEA is a Minnesota-based non-profit environmental organization, the legal and scientific voice protecting and preserving Minnesota's wildlife, natural resources, and the health of its people. We have members across the state of Minnesota, some of whom live and recreate near the proposed mine expansion.

The proposed Minntac Extension has the potential for significant environmental effects and should undergo an Environmental Impact Statement for the following reasons:

1. The proposed extension will extend the life of the mine and expand the tailings basin, contributing to MinnTac's already-significant water pollution problems;
2. The project proposes to destroy 66.7 acres of valuable wetlands, and impact another 5.4 acres, without a viable replacement plan;
3. The project increases mercury emissions over the life of the mine, in violation of the Statewide Mercury Total Maximum Daily Load ("TMDL"); and
4. The EAW lacks specific details on important environmental impacts, including the excavation and disturbance of potentially contaminated sites and the use of taconite tailings in the CSAH relocation project.

I. **FACTUAL BACKGROUND**

US Steel – Minntac is a taconite mining and processing facility located near Mountain Iron, St. Louis County, Minnesota. It is proposing a 483-acre extension of its existing open pit mine. The extension will require:

- Elevating stockpiles up to 170 feet to accommodate additional waste materials;
- Building up the tailings basin between 70 and 90 feet higher than current elevation to accommodate 550,000,000 cubic yards of tailings;

- Relocating a segment of County State Aid Highway 102;
- Adding a mine access road using mine waste rock; and
- Destroying 66.7 acres of valuable wetlands, and impacting another 5.4 acres of wetlands by fragmenting portions of wetlands.

The proposed extension will not increase production of taconite at the facility, but it is estimated that it will extend mine life and taconite production to 2031.

Minntac currently holds two relevant NPDES/SDS Permits: Permit No. MN0057207 for the tailings basin area, a permit that expired in 1992 but was modified in 2010 without extending the expiration date; and Permit No. MN0052493 for the mine pit area. Permit No. MN0057207 for the tailings basin area does not have any discharge limits for pollutants discharged from the tailings basin; instead it is “specifically designed to achieve a ‘no net increase’ in mass loading of sulfate and calcium to the tailings basin.”¹ In other words, the water that the Minntac facility discharges to the tailings basin is expected to have no higher pollutant content than the water it took in for use in its scrubber system. However, Minntac has violated its permit and discharged excess sulfate and hardness in its discharge to the tailings basin every year since at least 2007.²

Permit No. MN0052493 for the mine pit area was issued in 2004 and expired on November 30, 2008.³ The receiving waters for this permit include unnamed wetlands and ditches tributary to the East Two River, Parkville Creek, the West Branch of the East Two River, the East Branch of the West Two River, two unnamed creeks tributary to the West Two River Reservoir, an unnamed creek tributary to Kinross Creek, unnamed creeks and wetlands tributary to Kinney Lake, Kinney Cree, Forsyth Pit Lake, the Western Drainage Ditch, an unnamed creek tributary to Kinney Creek, and unnamed wetlands. The permit contains limits and monitoring requirements for seven discharge points: SD001, SD002, SD003, SD004, SD007, SD009, and SD010. The permit contains limits for dissolved iron, pH, and Total Suspended Solids. It requires monitoring but does not limit discharge of bicarbonates, calcium, cobalt, hardness, lead, magnesium, manganese, mercury, nitrogen (total), nitrogen (un-ionized), specific conductance, total sulfates, temperature, and flow.

Enforcement actions taken against Minntac have a long and complicated history. It has been subject to at least four separate Schedules of Compliance (“SOC”) since 2001 in an effort to bring it into compliance with water quality and air quality standards; it has also paid over \$100,000 in penalties for violations of those SOCs. It is currently subject to a Schedule of Compliance signed June 9, 2011 that relates to both the Minntac and Keetac facilities. The

¹ See NPDES/SDS Permit No. MN0057207, p. 5 (attached as Exhibit 1).

² See *In the Matter of United States Steel Schedule of Compliance*, Part 6, p. 8-9 (attached as Exhibit 2).

³ Minn. Rule 7001.0160 permits an applicant to operate under an NPDES Permit after expiration if an application for a new permit was submitted at least 180 days before expiration. It is unclear whether the tailings basin permit remains in force an extraordinary 20 years after expiration, after at least five continuous years of violations of the permit by Minntac, and after undergoing at least two major modifications without extending the expiration date. Reissuance of the mine pit area permit, which is four years overdue, is less tardy only by comparison to the tailings basin permit. While Minn Rule 7001.0160 does not contain an expiration date by which a new permit should be issued, the rule was not intended to be abused in this way.

current Schedule of Compliance addresses NO_x emissions at Minntac, mercury emissions at both Minntac and Keetac, and sulfate and hardness discharges at Minntac.

Under the 2011 SOC, US Steel is required to implement a Dry Controls Project on Taconite Production Line 6 at the Minntac facility, a pilot project intended to control air pollutants.⁴ If the MPCA approves of the project when it is complete, US Steel is expected to implement the same technology on its other lines at Minntac.⁵ US Steel is required to install a Low NO_x Burner on the same line, Line 6.⁶ US Steel is required to pilot unspecified mercury control technology at its Keetac facility to comply with mercury limits,⁷ even as it expands the Keetac facility and proposes expanding its mine at Minntac, both of which will result in additional mercury emissions in violation of the Statewide Mercury TMDL. US Steel is required to propose unspecified solutions to its sulfate and hardness violations at Minntac. It is also required to evaluate the feasibility of collecting seepage on the Dark River side of its Minntac tailings basin, similar to the previously-implemented seepage collection system on the Sandy River side. Finally, it is required to install monitoring wells that will refine a groundwater model for sulfate transport and monitor compliance with the sulfate groundwater standard at the property boundary.⁸

Some of these steps may produce immediate results, such as the Dark River collection system, which will likely decrease pollutant-laden discharges from the tailings basin (though not eliminate them, as the tailings basin will still have deep seepage). Others will take many years, if they yield any results at all, such as the mercury control technology pilot project, which does not specify any particular technology and contains no enforcement if the pilot project fails. The theme, however, is clear: US Steel has been subject to multiple SOCs in an effort to get it to comply with applicable environmental law, and it has yet to achieve compliance. In addition, a NPDES Permit is a poor mitigation tool where the MPCA allows Minntac to operate for years, if not decades, under expired permits without reissuing them.

II. LEGAL BACKGROUND

The EAW for the Minntac Extension is mandatory under Minnesota Rule 4410.4300, subpart 24.A. An EAW is a "brief document which is designed to set out the basic facts necessary to determine whether an environmental impact statement is required" for the project.⁹ An EIS is required where any major governmental action creates the "potential for significant environmental effects."¹⁰ The regulatory government unit's ("RGU's") analysis must take into account both the EAW and any comments received from the public.¹¹

⁴ Ex. 2, Part 7, paragraphs a-i.

⁵ *Id.*, Part 7, paragraph g.

⁶ *Id.*, Part 7, paragraph j-l.

⁷ *Id.*, Part 7, paragraphs o - ee.

⁸ *Id.*, Part 7, paragraphs jjj - ooo.

⁹ Minn. Stat. § 116D.04, subd. 1a.

¹⁰ *Id.*, subd. 2a; Minn. R. 4410.1700, subp. 1.

¹¹ Minn. Stat. § 116D.04, subd. 2a(b).

According to the Environmental Quality Board rules, the RGU must consider four criteria when determining whether a proposed project has the potential for significant environmental effects.¹² First, the RGU must consider the “type, extent, and reversibility of environmental effects.” Second, it must consider the cumulative potential effects. In considering cumulative potential effects, the RGU must consider “whether the cumulative potential effect is significant; whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect; and the efforts of the proposer to minimize the contributions from the project.”

Third, the RGU must consider “the extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority.” When considering ongoing regulatory authority, the RGU may rely “only on mitigation measures that are specific and that can be reasonably expected to effectively mitigate the identified environmental impacts of the project...”¹³ The RGU may not rely on future monitoring or permit conditions to address issues should they arise. Rather, the “very purpose of an EIS...is to determine the potential for significant environmental effects *before* they occur.”¹⁴ Fourth, the RGU must consider “the extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EISs.”¹⁵

Additionally, any “[c]onnected actions and phased actions shall be considered a single project for purposes of the determination of need for an EIS.”¹⁶

III. THE MINNTAC EXPANSION SHOULD UNDERGO AN EIS FOR MULTIPLE REASONS.

US Steel Minntac is a facility with a lengthy and ongoing history of violations of environmental law. The MPCA has gone through at least four Schedules of Compliance in the past 12 years, and the EPA is currently considering enforcement action against Minntac for violations of the Clean Water Act. While the DNR may be tempted to rely on existing measures, such as the SOC, as mitigation measures designed to address ongoing environmental problems at the Minntac facility, MCEA cautions against such an approach. The regulatory history of Minntac is one of failure and ongoing violations, rather than compliance and success.

¹² Minn. R. 4410.1700, subp. 7.

¹³ Minn. R. 4410.1700, subp. 7.

¹⁴ *Trout Unlimited, Inc. v. Minnesota Dept. of Agriculture*, 528 N.W.2d 903, 909 (Minn. Ct. App. 1995).

¹⁵ Minn. R. 4410.1700, subp. 7.

¹⁶ Minn. R. 4410.1700, subp. 9.

A. The Proposed Extension Will Extend the Life of the Mine and Expand the Tailings Basin, Contributing to Minntac's Already-Significant Water Pollution Problems.

- i. **Minntac is already out of compliance with its NPDES Permit. A project that apparently cannot comply with water quality standards demands, at a minimum, an EIS to evaluate potentially significant environmental effects.**

The previous expansion of the Minntac mine was expected to extend the life of the mine until 2015.¹⁷ The proposed expansion is expected to extend the life of the mine until 2031, an additional 16 years. The current mine is not in compliance with at least one of its NPDES Permits. An EAW for a new project that could not comply with water quality standards would, at a minimum, demand an EIS. This proposal should be treated no differently – if the expansion did not go forward, then the mine would close in approximately 3 years and US Steel would begin reclamation efforts to clean up the site. (If this were an EIS, this would be considered the “no action” alternative, and is the baseline to which environmental effects should be compared.) If the expansion does go forward, Minntac will be, in essence, starting a new mining project that will result in water quality violations for at least 16 years. No such project should be permitted without a more thorough EIS as 16 years of water quality violations is certainly a significant environmental effect.

The EAW concedes that its proposal will increase pollution from the tailings basin:

Increased in-pit disposal may result in runoff, and therefore mine sump dewatering discharges, with elevated concentration of certain dissolved constituents (e.g. sulfate, hardness, alkalinity, chloride). This could result in an increase of these constituents in downstream receiving waters with concentrations decreasing with distance from the point of discharge.¹⁸

The EAW also concedes that sulfates will be a problem as the local geology does contain sulfur and pyrites. The EAW “acknowledges that sulfate levels in the tailings basin have become problematic for seepage discharge to the environment.” This is an understatement, as the sulfate loading has increased in the tailings basin year after year and continues to discharge to surface waters. The EAW does not contain an adequate discussion of whether the additional sulfates or other pollutants constitute a potential for significant environmental effects.

- ii. **Minntac's NPDES/SDS Permits and Schedule(s) of Compliance are not an adequate mitigation measure for its discharges of pollutants.**

The EAW goes on to suggest that the proper forum for addressing these concerns is the NPDES permitting process: “Levels of these constituents in mine pit dewatering discharges will be taken into account in future NPDES/SDS permitting.”¹⁹

¹⁷ US Steel-Minntac Extension EAW, May 1, 1996, p. 3 (attached as Exhibit 3).

¹⁸ Minntac Mine Extension EAW, p. 29.

¹⁹ *Id.*

As described above, the Minntac's NPDES permitting process is not an effective mitigation tool. First, there are no limits in the current permit for these "constituents" except for alkalinity – the NPDES Permit for the tailings basin only contains limits for dissolved iron, pH, and Total Suspended Solids. It requires monitoring but does not limit discharge of bicarbonates, calcium, cobalt, hardness, lead, magnesium, manganese, mercury, nitrogen (total), nitrogen (un-ionized), specific conductance, total sulfates, temperature, and flow. It does not even require monitoring for chlorides. Thus, the current NPDES permit is not an effective mitigation measure for dealing with this increase in pollution.

Second, Minntac's SOC is not an effective mitigation tool, either. Minntac is not in compliance with its permit, and is under its fourth Schedule of Compliance since 2000. The current Schedule of Compliance contains no date certain by which Minntac must comply with effluent limits, and no penalty even if it *never* successfully complies. Nor does the current SOC take into account the proposed extension.

Third, DNR cannot rely on a new NPDES Permit to be issued soon to address these issues, if history is any guide. One of Minntac's NPDES Permit has been expired for four years, and the other for an unprecedented twenty years. The MPCA shows no signs of reissuing these permits. Since neither the SOC nor the NPDES Permits provide assurance that increased pollutants will be addressed, an EIS should take place that will address them.

iii. The Permit to Mine is not an adequate mitigation measure to avoid the impacts of increased sulfates.

The EAW states that "DNR Lands and Minerals and the MPCA are currently exploring if materials handling/stockpiling at the site could be managed in such a way that reductions in sulfate levels could be achieved," and those "potential changes" could be incorporated into a Permit to Mine.²⁰ First, the EAW fails to explore the potential environmental impacts of the increased sulfate discharges. Sulfate affects wild rice production and mercury methylation in fish, both significant environmental effects. Second, the EAW fails to describe any specific measures that could be taken to reduce sulfate levels. The DNR may only consider ongoing regulatory authority as a mitigation measure if the mitigation measures are "specific" and "can be reasonably expected to effectively mitigate the identified environmental impacts of the project...."²¹ Neither condition is present here.

Third, the DNR may not rely on future permitting to address environmental issues should they arise. Rather, the "very purpose of an EIS... is to determine the potential for significant environmental effects *before* they occur."²² In other words, it is not acceptable to acknowledge that there may be a sulfate problem and it may get resolved through some unspecified means in the future, and those means might be a requirement of a future permit. The effects of increased sulfates and other pollutants should be studied now through an EIS.

²⁰ EAW, pp. 33 and 45.

²¹ Minn. R. 4410.1700, subp. 7.

²² *Trout Unlimited, Inc. v. Minnesota Dept. of Agriculture*, 528 N.W.2d 903, 909 (Minn. Ct. App. 1995).

B. The Project Proposes to Destroy 66.7 Acres of Valuable Wetlands, and Impact Another 5.4 Acres, Without a Viable Replacement Plan.

The proposed extension will destroy 66.7 acres of valuable wetlands. Minnesota law has long recognized the importance of wetlands as an important public resource, requiring that wetlands may not be drained unless they are replaced by wetlands with equal or greater public value.²³ Thus, Minnesota law requires “no net loss” of wetlands.²⁴ However, it is not enough to simply replace lost wetlands; there must be no net loss in the “quantity, quality, and biological diversity of Minnesota’s existing wetlands.”²⁵ The public value of wetlands replaced is based on multiple factors, including water quality, such as filtering pollutants to surface and groundwater; flood water and storm water retention; public recreation and education; commercial uses including wild rice and cranberry growing; fish, wildlife and native plant habitats; low-flow augmentation; and other functions and public uses identified in the wetland evaluation methods.²⁶

US Steel proposes to replace the wetlands it is destroying using the Palisade site in Aitkin County at a ratio of 1.5:1. The Palisade site as proposed would simply add some low berms along existing ditches and cease cropping of marginal farm land which is often too wet to produce a crop since much of the area is still classified as wetlands and is dominated by soil types commonly associated with wetlands. This mitigation site has not been approved, nor should it be, according to comments by Board of Water & Soil Resources (“BWSR”). There is no evidence that the Palisade site will result in a net increase in wetlands of similar quantity, quality and biological diversity of the wetlands lost in the proposed extension. The existing site appears to already provide many wetland functions in its current condition.

Recent correspondence from BWSR to DNR reveals that the report on the Palisades project is “woefully inadequate” and lacks “essential information.”²⁷ For instance, the report does not include a wetland delineation plan, which is essential to evaluating the eligibility and credit yield of the project.²⁸ It does not contain a specific plan for restoring wetlands; for instance, it fails to identify which ditches may be plugged, and which will be maintained, and how US Steel intends to restore natural hydrological conditions.²⁹ It contains no construction plan, may require constant human intervention to maintain the site, does not describe what type of native vegetation will be restored, and does not emulate pre-development conditions.³⁰

In addition, the plan identifies incorrect statutory requirements as it creates wetlands, rather than replaces them.³¹ The Palisades project also seems to estimate that the entire property will be used for wetlands credits, but some areas will be devoted to berms, buffer credits, and other areas

²³ M.S.A. § 103G.221.

²⁴ Minn. Rule 8420.0100, subp. 1.

²⁵ *Id.*

²⁶ Minn. Rule 8420.0522; made applicable to mining projects in Minn. Rule 8420.0930, subp. 2(B).

²⁷ Letter from Dan Girolamo, Wetland Bank Administrator, to Kate Paul, dated January 18, 2012, p. 5 (attached as Exhibit 4).

²⁸ *Id.* at p. 2.

²⁹ *Id.*

³⁰ *Id.* at p. 2-3.

³¹ *Id.* at p. 3.

that are ineligible for wetland credits.³² Indeed, the project proposes so many areas that will be filled for berms and upland buffers, the creation of those berms and buffers may *themselves* be a project that requires wetland replacement.³³ Finally, and perhaps most importantly, there is no evidence that the plan will replace the functionality of the wetlands lost:

The overarching replacement requirement of WCA is the replacement of functions and public value lost to wetland impacts. The current plan appears to consist primarily of excavation down to the groundwater table, construction of berms, and a reliance on precipitation. The functional benefits of these activities are questionable. For example, excavation down to groundwater can reduce the soil's filtration capacity, and, in the absence of hydrologic restoration, water quality and floodwater retention functions are unlikely to be improved significantly over current conditions.³⁴

BWSR's final review of the project raises similar concerns, which remain unresolved.³⁵ Ultimately, BWSR states that the bank will not produce viable wetlands, and recommends that US Steel be required to submit financial assurance so that "alternative replacement can be provided if the site fails to achieve performance goals."³⁶

The Palisades Plan also fails to identify the function of lost wetlands, opting instead to offer up a laundry list of potential wetland functions without identifying which ones are impacted by the specific wetlands destroyed with this proposed extension.³⁷ This is not the type of evaluation envisioned in Minnesota Rule 8420.0522 when it laid down the standards for evaluating the public value of a wetland. The EAW does no better, simply listing the types of wetlands lost without evaluating their functionality.³⁸

An EIS should be performed to determine the functionality of wetlands lost, and whether the replacement proposed at the Palisades site meets statutory requirements .

C. The project increases mercury emissions over the life of the mine, in violation of the Statewide Mercury TMDL.

- i. The Statewide Mercury TMDL requires US Steel to decrease its mercury emissions by 65 percent by 2025. US Steel is proposing to increase its emissions over that baseline for the second time since the TMDL was introduced, with no reductions in sight.**

Mercury is a neurotoxin that accumulates in fish in levels that are potentially toxic to humans and wildlife. In 2007, the MPCA adopted a Statewide Total Maximum Daily Load ("TMDL")

³² *Id.* at 4.

³³ *Id.*

³⁴ *Id.*

³⁵ Letter from Dan Girolamo, Wetland Bank Administrator, to Jill Bathke, ACOE, dated April 20, 2012 (attached as Exhibit 5).

³⁶ *Id.*, p.2.

³⁷ Palisade III Wetland Mitigation Bank Site Report, March 2012, Section 3.1, p. 20 (attached as Exhibit 6)

³⁸ EAW, p. 18.

for mercury. The MPCA has identified taconite production as a significant source of mercury in Minnesota.³⁹ Minnesota's Mercury TMDL Emissions Reduction Goal is to reduce total mercury emissions by 65 percent, which involves reducing anthropogenic sources by 93 percent, as some sources are natural and cannot be controlled.⁴⁰

In its Implementation Plan for Minnesota's Statewide Mercury Total Maximum Daily Load, the MPCA adopted guidance for new or modified existing mercury-emitting activities. These guidelines state that a new or modified facility should assess "whether its added emissions will impede progress toward attaining the source category's pounds-per-year air emission goal."⁴¹ If additional mercury emissions from the new or modified source are "greater than 3 lb/yr, the facility permittee is expected to arrange for a reduction from existing Minnesota sources equal to the new actual emissions."⁴² The new or modified source is also required to "[e]mploy the best mercury control available."⁴³

In order to achieve the ambitious mercury reduction goal outlined in the Statewide TMDL, US Steel has committed to a goal of reducing total emissions 75 percent, from a baseline of 291.1 lb/yr to 72.8 lb/yr by 2025.⁴⁴ This goal has become increasingly elusive, as a recent expansion of the Keetac facility is projected to increase emissions another 75.5 lb/yr over the baseline of 291.1 lb/yr.

Yet again, US Steel is proposing to increase its mercury emissions with no plans to achieve the TMDL goal. US Steel may argue that they are not increasing emissions since their expansion will not increase yearly production and processing at the site. But, it will increase the life of the mine and processing facilities by 16 years. If there were no expansion, the mine and the processing facility would close in approximately 2015, meaning that mercury loading would move to zero. Moreover, the current Statewide Mercury TMDL does not take into account mine expansions. The Implementation Plan for the TMDL specifically states that the current target for reductions in mercury emissions from taconite facilities "is not intended to include *new or expanding* nonferrous mining and processing facilities."⁴⁵ The Minntac mine expansion is a deviation from the current mercury reduction goals, and is regulated as a new and expanding source of mercury.

³⁹ See Sources of Mercury Pollution and the Methylmercury Contamination of Fish in Minnesota, found at <http://www.pca.state.mn.us/index.php/view-document.html?gid=288> (last visited 9/5/2012).

⁴⁰ See Minnesota Statewide Mercury Total Maximum Daily Load, p. 39, found at <http://www.pca.state.mn.us/index.php/view-document.html?gid=8507> (last visited 9/5/2012).

⁴¹ See Implementation Plan for Minnesota's Statewide Mercury Total Maximum Daily Load, App. 6, found at <http://www.pca.state.mn.us/index.php/view-document.html?gid=11481> (last viewed 9/5/2012).

⁴² *Id.*

⁴³ *Id.*

⁴⁴ See Schedule of Compliance, Multi-Media Pollutant Reduction, filed June 9, 2011, attached as Exhibit 2.

⁴⁵ See Implementation Plan, p. 14.

- ii. **To comply with the Statewide Mercury TMDL, US Steel must obtain offsets for its increased mercury emissions prior to expanding the Minntac mine.**

Under the TMDL Implementation Plan, U.S. Steel must “arrange for a reduction from existing Minnesota sources” that is concurrent with its increase in emissions. A promise for future reductions is an increase in the present. The Implementation Plan is specific about how an offset is to be achieved. Proposed new or expanded sources must:

Submit a plan to the MPCA to account for the proposed emission. New sources must first seek permanent offsets with an existing source or sources in Minnesota at a 1:1 ratio.

If enough existing sources are not available, new sources must propose a plan to achieve at least a 90% reduction of the proposed emission by 2025, and in addition must secure temporary offsets *prior to operation* from either:

- a. Existing sources in Minnesota at a 1:1 ratio.
- b. Out-of-state sources at a ration greater than 1:1, based on the location of the source.⁴⁶

In this case, given the apparent lack of technology available to taconite facilities, US Steel must secure temporary offsets from existing sources in Minnesota at a 1:1 ratio, or from out-of-state sources at a greater ratio.

- iii. **The current Schedule of Compliance is not an offset, nor is it an adequate mitigation measure to address Minntac’s mercury emissions, as it does not assure any reductions in emissions.**

On June 9, 2011, U.S. Steel and the MPCA signed a Schedule of Compliance designed to address ongoing problems with multiple pollutants emitted and discharged from US Steel’s Minntac and Keetac operations.⁴⁷ As the Schedule of Compliance notes, “To date, no mercury control technologies have been tested long term or installed on a taconite indurating furnace.” The Schedule of Compliance merely commits US Steel to “installing and operating mercury control technology on the new indurating furnace at Keetac.” It does not assure that any actual mercury reductions occur.

The SOC provides no assurance that US Steel’s efforts will be successful, and no enforcement mechanism if they are not. The Draft Permit contains no term that requires or assures compliance with the reductions required by the Statewide Mercury TMDL. The uncertainty surrounding the success of the testing of proposed mercury control technology is evident on the face of the permit. The permit contains the MPCA’s fallback position:

⁴⁶ Strategy Framework for Implementation of Minnesota’s Statewide Mercury TMDL, p. 21 (emphasis added).

⁴⁷ Based on conversations with PCA staff, MCEA understands that this agreement includes verbatim and is intended to ultimately supplant the August 11, 2010 Mercury Air Emission Reductions Schedule of Compliance found at Appendix 7a of the draft permit.

The mercury reduction technology demonstration report, required in Table B shall propose a reasonably expected mercury reduction, if the demonstration results indicate that the Mercury Emissions Reduction Goal is not achievable.⁴⁸

In other words, no one knows yet if the technology that US Steel is testing will work, and if it doesn't, there is no consequence. US Steel simply needs to propose a new mercury reduction schedule. It is entirely inconsistent with the TMDL goals to allow substantial additional mercury emissions with no identified way for US Steel to arrange for any reduction in mercury. The TMDL goals require incremental declines in mercury emissions on a regular basis if they are to be achieved.⁴⁹ US Steel cannot meet these incremental goals if it continues to increase mercury emissions without offsets.

The failure to comply with the Statewide Mercury TMDL is not mentioned in the EAW. This is a significant environmental effect that requires an EIS.

D. The EAW Lacks Specific Details on Important Environmental Impacts, Including the Impact on the Water Quality of the Tailings Basin Due to the Proposed Expansion and the Impacts of the New Mine Access Road Over the Wacootah Pit.

The EAW fails to explore environmental effects or mitigation measures in sufficient detail in a number of areas. Each of these areas requires either a new EAW that provides sufficient information to determine whether there is a potential for significant environmental effects, or an EIS.

- i. The proposed mine extension includes excavating or disturbing several contaminated site without any plans for proper disposal of contaminated materials.**

The proposed Mine Extension includes three existing mines – the Atkins Mine in the West Pit extension, and the Hanna and Pilot mines in the East Pit extension.⁵⁰ The EAW notes that the Atkins mine is an inactive Superfund site. The sole source of information on this site provided in the EAW is the fact that the site was not listed on the National Priorities List (“NPL”), and it is inactive. But a site is not clean merely because it is not on the NPL, which only lists the most serious sites slated for long-term cleanup.⁵¹ There were apparently investigations done in 1984 and 1990 into the extent of contamination on the site. These reports as well as additional investigation into existing conditions should be evaluated before any mine extension can go forward. Several other potentially contaminated sites will also be disturbed, including the Inland Steel-Iroquois Mine Site near the new mine access road,⁵² the Mountain

⁴⁸ Draft Permit, A-64.

⁴⁹ See Strategy Framework for Implementation of Minnesota's Statewide Mercury TMDL, Chart of Projected Mercury Emissions 2005-2025, p. 6.

⁵⁰ EAW, p. 8.

⁵¹ See How Sites are Place on the NPL, http://www.epa.gov/superfund/programs/npl_hrs/nplon.htm (last visited 9/5/2012). A site is placed on the NPL through a series of very specific steps that may not be present in all situations merely because a site is contaminated.

⁵² EAW, p. 9.

Iron dumpsite near the CSAH 102 relocation, which has undergone at least two Phase I Environmental Site Assessments,⁵³ and the Parkville Dump and Park Ridge Road Landfill, also as part of the CSAH 102 relocation.⁵⁴ At least some information is available on the Mountain Iron and Park Ridge sites, but the EAW neglects to mention any details about the nature and extent of contamination at these sites.

Excavating a contaminated site is a potentially dangerous and expensive proposition. To remediate a contaminated site, a party must carefully characterize the site conditions, determine the nature of the waste, assess any risk to human health or the environment, and conduct treatability testing to evaluate the potential performance and cost of the treatment technologies that are being considered.⁵⁵

The EAW takes none of these steps; indeed, it makes no effort at all to determine the nature of the contamination at the five potentially contaminated sites. But excavating or disturbing contaminated soil without any information about the nature of the contamination nor any plans to dispose of it properly is irresponsible, as well as dangerous. Exposing humans and wildlife to contaminated materials is a potentially significant environmental effect, and demands an EIS, or at least a new EAW that makes some effort to determine the extent and nature of contamination at the sites.

- ii. **The CSAH 102 does not specify the materials to be used. The EAW should clarify whether Minntac still intends to use tailings as building material for the proposed relocation.**

The EAW properly analyzes the relocation of CSAH 102 as a connected action.⁵⁶ However, it fails to specify whether it still intends to use tailings in the building materials, as it proposed to do in an earlier Environmental Assessment (“EA”).

This is not Minntac’s only proposed expansion. Another project, running concomitantly, is the proposed Minntac Expansion (not to be confused with this project, termed the “Minntac Extension”). The Expansion has already undergone an EA as well as a 404 Permit from the Army Corps of Engineers. The EPA commented on the EA, expressing concern that taconite tailings would be used as building materials for roadways:

Degraded taconite fines found in roadway materials act much like asphalt, thus normal roadway wear-and-tear will ultimately erode taconite tailings, leading to leaching and atmospheric entrainment and deposition of mercury and possibly asbestiform fibers, causing acidification of surface water and potential human health impacts.⁵⁷

⁵³ *Id.*

⁵⁴ *Id.*

⁵⁵ See, e.g. Remedial Investigation/Feasibility Study at <http://www.epa.gov/superfund/cleanup/rifs.htm> (last visited 9/5/2012). While the Atkins Mine is not an official Superfund site, the Superfund website provides helpful guidance on the proper steps in handling a contaminated site.

⁵⁶ Minn. R. 4410.1700, subp. 9.

⁵⁷ Letter from Kenneth A. Westlake, NEPA Implementation Section, EPA to Jill Bathke, U.S. ACOE, dated Apr 5, 2012, p. 2 (attached as Exhibit 7).

In its response, the Army Corps dismissed EPA's comments on the premise that CSAH 102 relocation was not a connected action to this earlier proposal.⁵⁸ The time has come to address this issue, since it is a connected action to the present proposal. The EAW, or an EIS, should discuss whether US Steel intends to use taconite tailings in the construction of CSAH 102, and the potential for significant environmental effects that results.

IV. CONCLUSION

The Minntac mine, as it currently exists, presents multiple regulatory and environmental challenges. It is a facility with expired NPDES Permits that has failed to comply with at least one of those permits year over year, and is currently under its fourth Schedule of Compliance to address not only the violations of its NPDES Permits but also mercury, NO_x, and other air and water quality issues. Prolonging the life of this troubled mine is a proposal that cannot be taken lightly. An EIS is required to explore the potential environmental effects of multiple aspects of the project for the following reasons:

1. The proposed extension will extend the life of the mine and expand the tailings basin, contributing to Minntac's already-significant water pollution problems;
2. The project proposes to destroy 66.7 acres of valuable wetlands, and impact another 5.4 acres, without a viable replacement plan;
3. The project increases mercury emissions over the life of the mine, in violation of the Statewide Mercury TMDL; and
4. The EAW lacks specific details on important environmental impacts, including the excavation and disturbance of potentially contaminated sites and the use of taconite tailings in the CSAH relocation project.

MCEA appreciates the opportunity to comment on this EAW. Please do not hesitate to contact me with any questions.

Sincerely,



Kathryn M. Hoffman
Staff Attorney
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Saint Paul, MN 55101
(651) 287-4863
khoffman@mncenter.org

⁵⁸ Letter from Tamara E. Cameron, Chief, Regulatory Branch, US ACOE to Kenneth E. Westlake, EPA, dated April 30, 2012, p. 2 (attached as Exhibit 8).

Lisa Fay
September 5, 2012
Page 14

Enclosures

cc: Kerryann Weaver
John Jaschke
Tom Landwehr
John Linc Stine

Fay, Lisa (DNR)

From: Lundy, James (MDH)
Sent: Wednesday, September 05, 2012 1:05 PM
To: *Review, Environmental (DNR)
Subject: MDH Source Water Protection comments to Minntac Mine Extension

Here are the comments of the Source Water Protection program at the Minnesota Department of Health for the above proposal. We understand the comment deadline is today (September 5, 2012), and that this email will serve as a transmittal of our comments. We also plan to send a letter via regular mail shortly. If there are questions, please contact me at the phone or email address below.

Subject: Environmental Review Comments on United States Steel Corporation, Minnesota Ore Operations--Minntac, St. Louis County, Minnesota

I am writing to comment on the "United States Steel Corporation, Minnesota Ore Operations--Minntac" Environmental Assessment Worksheet (EAW) dated August 1, 2012, on behalf of the Drinking Water Protection Section of the Minnesota Department of Health (MDH). The Drinking Water Protection Section includes wellhead protection planning, a preventive program designed to safeguard public drinking water supplies.

We offer the following comments on the proposed, below. Electronic files containing the geometry (ArcMap geographic information system shapefiles) of these DWSMAs are available at the following web page on the MDH website: <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>.

- 1) Our general recommendation is that project activities are carefully planned to avoid unnecessary contamination of drinking water supplies.
- 2) The proposed access road realignment will cross a portion of the Drinking Water Supply Management Area (DWSMA) for the City of Mountain Iron. The Wellhead Protection Plan that was developed to support the delineation of that DWSMA indicates that the Iroquois Mine pit lake, which is situated immediately to the west of the proposed access road realignment, provides a significant quantity of recharge to city well number 1 (unique well number 150524). The degree of hydraulic connection between the Iroquois Mine pit lake and the Wacootah Mine pit lake, which will be directly impacted by the proposed access road, is unknown at this time. It will be important to construct and operate the proposed access road in a manner which will safeguard the water quality of the Iroquois Mine pit lake so as not to degrade the City of Mountain Iron drinking water supply. Please consider the enclosed "Source Water Protection Issues Related to Storm Water".
- 3) The proposed southerly extension of mine activities may alter existing groundwater flow pathways and water levels within the Biwabik Iron Formation aquifer. This aquifer is the drinking water supply for the cities of Mountain Iron and Kinney, whose wells and DWSMA's lie in close proximity to the proposed extensions. Given the uncertain nature of groundwater flow within the fractured rock that comprises the iron formation aquifer, it is not possible to predict with certainty what impact if any the proposed extension will have on these water supplies. Because of this uncertainty, the MDH recommends that Minntac work with the cities of Kinney and Mountain Iron to develop a monitoring and contingency plan prior to the proposed expansion. Key components of such a plan would include establishment of baseline conditions for water levels and chemistry at the existing city wells and a contingency arrangement in the event that expansion related activities can be shown to have had a negative impact on these municipal water supplies.

Thank you for the opportunity to review and comment on the United States Steel Corporation, Minnesota Ore Operations—Minntac EAW.

Sincerely,

James R. Lundy, Hydrologist
Environmental Health Division
P.O. Box 64975
St. Paul, Minnesota 55164-0975
651/201-4649

Jim Lundy
MDH, Source Water Protection

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STATE HISTORIC PRESERVATION OFFICE

September 5, 2012

Lisa Fay, Principal Planner
Environmental Review Unit
MnDNR Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul MN 55155-4025

RE: EAW – Minntac Mine Extension
City of Mountain Iron, Township of Great Scott, St. Louis County
SHPO Number: 2012-2638

Dear Ms Fay:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) submitted for the above project. It has been reviewed pursuant to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

The Minntac Mine is a large existing facility located in Mountain Iron, northwest of Virginia. From the information provided, we understand that the current EAW covers only the proposed incremental extension of the existing west and east pits of the Mine southward, beyond existing permit boundaries. However, please be aware that our office has been or will be involved in additional aspects of this project. The larger project is currently under Section 106 review by the US Army Corps of Engineers, St. Paul District. We have a Programmatic Agreement with the Corps for the "Minntac Western Progression" (the west pit). The Corps is also reviewing the east pit and the access roads, but they have not submitted anything to us yet. We may also become involved in MnDOT's review of the proposed access roads to the south of, and leading into, the east pit.

As you are aware, **The Mountain Iron Mine National Historic Landmark is sandwiched between the extant west and east pits.** Furthermore, immediately southeast of the NHL, and partially within the proposed extension area for the east pit, is the proposed National Register-eligible Mountain Iron Mining Landscape Historic District.

As part of the Corp's overall project review, we have reviewed a summary report of a Phase I archaeological survey for both pits, but have not yet received the full report. We concurred with the recommendation in the summary report for Phase II evaluation of the Staff Family Farmstead site, located in the Western Progression portion of the west pit, but very near one of the proposed extension areas covered by your EAW. We have not yet received the Phase II study. The EAW states on page 41 that "no additional work is recommended within the Extension areas." We disagree with that statement, because of the recommendation for the Phase II work. It is also possible that the Corps will recommend further archaeological work in connection with pending wetland permit requirements.

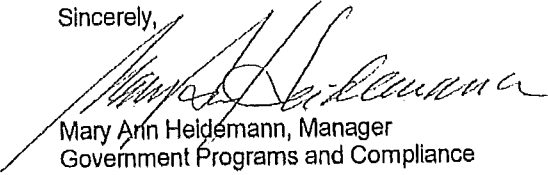
The EAW states (on p. 41) that the NHL and the proposed historic district "will not be directly affected." We disagree. A portion of the Minntac Mine Extension area at the east pit overlaps with the proposed Mountain Iron Mining Landscape Historic District. Therefore we believe that additional review for historical archaeology (under the Minnesota Field Archaeology Act) is needed within the overlap area. Further, the proposed access roads cut through the middle of the historic district, and the road impact areas should be reviewed for historical archaeology. Finally, proposed east pit extension areas near the National Historic Landmark should be evaluated for potential visual effects. Because of the existing mining landscape, those effects may not necessarily be adverse, but will need to be looked at to assure protection of the Landmark.

Please be aware that the Corps of Engineers is also reviewing the project in regard to potential Traditional Cultural Properties (TCPs) and other traditional use areas, including pollution of wild rice and fish spawning grounds, and the Laurentian divide. We agree that it is important that cultural resources review of the project include these types of resources, both within the area of direct impacts and beyond.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36CFR800, Procedures of the Advisory Council on Historic Preservation for the protection of historic properties. If this project is considered for federal assistance, or requires a federal permit or license, it should be submitted to our office by the assisting federal agency.

Please contact our archaeologist, David Mather, at (651) 259-3454 if you have any questions regarding our review of this project.

Sincerely,



Mary Ann Heldemann, Manager
Government Programs and Compliance

cc: Brad Johnson, US Army Corps of Engineers

USS-Minntac Mine Extension Project, EAW
MPCA Comments by Tom Estabrooks
September 4, 2012

Item 13

The EAW indicates that U.S. Steel is proposing to divert dewatering flow away from Sump #6 for additional/alternative process make-up water. According to the document, Outfall SD003 receives water pumped from the #6 Sump that is then discharged to McQuade/Kinney Creek. It should be noted that a section of this stream, also known as Un-named Creek (Assessment Unit ID# 04010201-551), has been identified by MPCA as impaired for Aquatic Life, according to the draft 2012 Impaired Waters (303(d)) List. The EAW should evaluate any proposed changes in operation of Sump #6/SD003 to determine if these changes will in any way contribute to the impairment and/or otherwise exacerbate existing water quality or habitat conditions.

Item 29

[Note: This is essentially the same comment that was submitted on the preliminary draft EAW that was not addressed] The EAW should address in more detail the cumulative effects that will result from the proposed project, in addition to that from past projects, or foreseeable future projects within each minor watershed, as well as collectively in the subwatershed of the St. Louis River. What are the environmental effects from the loss of contributing drainage area to a watershed (generally and specifically)? What are the environmental effects from the loss of stream length to a watershed (generally and specifically)? What are the potential cumulative environmental effects of these activities on the water quality of lakes, streams, and wetlands downstream of the project area? What is the cumulative effect of past, current, and future projects on the St. Louis River watershed? What measures will be implemented to minimize these effects? Much of the headwaters of area streams were centered on what is now mining areas, where the drainage to these watersheds has been eliminated and severely altered. What is the effect of the cumulative loss of wetlands and altered hydrology on the St. Louis River watershed?



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September 4, 2012

Lisa Fay, Principal Planner
Environmental Review Unit
MNDNR Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

Re: Minntac Mine Extension Project
Environmental Assessment Worksheet

Dear Ms. Fay,

Thank you for the opportunity to comment on the Environmental Assessment Worksheet for the Minntac Mine Expansion Project. Minnesota Power wholeheartedly supports this project and we look forward to the completion of the permitting process and subsequent commencement of the actual project.

Minnesota Power commends the Minnesota Department of Natural Resources (MNDNR), U.S. Army Corps of Engineers and Minnesota Pollution Control Agency for their thorough environmental review and tireless work in analysis of the many facets of this project. The planning, public communication and input associated with the review of this project will significantly and appropriately advance the environmental assessment process to the benefit of all Minnesotans

Minnesota Power acknowledges the significant positive socioeconomic impact to the region resulting from the Minntac Mine Expansion Project. Continued mining operations through 2031 will greatly enhance the economy of Northern Minnesota as these jobs provide stability not only for the miners and their families, but for those in supporting industries as well.

In closing, I'd like to thank you again for the opportunity to comment on the latter steps of this crucial permitting process, and we look forward to the opportunity to give our input on the permitting of other similar projects in the future.

Sincerely,

Dave McMillan

cc: Tom Kelly, General Manager-USS Minnesota Ore Operations
Mike Patton, Plant Manager-Minntac
Rob Wilmunen, Engineering Site Manager
Dave Tomassoni, State Senator-District 5
Tom Rukavina, State Representative-District 5A
Sandy Layman, IRR Commissioner
Jess Richards, DNR Director of Lands and Minerals
Gary Skalko, Mayor-City of Mt. Iron
Craig Pagel, President-Iron Mining Association of Minnesota (IMA)
Margaret Hodnik, VP-Minnesota Power and IMA Board Member

Fay, Lisa (DNR)

From: Margot Monson <mpmonson.insx@gmail.com>
Sent: Thursday, August 30, 2012 9:23 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 "Western Pit Progression" at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel's long history of non-compliance, it is reasonable to expect that permits won't prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac's cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Just do the ethical thing and require an EIS for ANY taconite mine expansion.

Sincerely,

Margot Monson

22 Ludlow Ave
Saint Paul, MN 55108

Fay, Lisa (DNR)

From: Margot Monson <mpmonson.insx@gmail.com>
Sent: Sunday, September 02, 2012 7:20 PM
To: Fay, Lisa (DNR)
Subject: Minntac Mine expansion proposal

Follow Up Flag: Follow up
Flag Status: Flagged

Lisa Fay

Minnesota Department of Natural Resources

500 Lafayette Road

St. Paul, MN 55155-4040

Dear Ms. Fay:

I live in St. Paul and am also a property owner in northern MN, and I care deeply about the health of our aquatic ecosystems. I don't have to explain to you why the health of our streams and wetlands is crucial to the overall integrity of our water resources in this state.

There absolutely must be a full Environmental Impact Statement before any expansion in acreage of U.S. Steel's Minntac Mine, and I ask that you do all in your power to see that it is done. There are already violations to the water quality standards from existing taconite mining, such as wild rice sulfate standards, and from the cumulative effects from old mines and tailings basins that have degraded some of our streams and wetlands, ie. the St. Louis River watershed, and these have not been addressed nor the offenders held responsible. Why not? To allow further expansion with the current violations on record seems totally irresponsible.

The abbreviated Environmental Assessment Worksheet does not deal with the seriousness of these problems, and a full EIS should be required.

Please give this the careful attention that it requires and ask for the complete EIS before any permits are allowed for the Minntac expansion.

I look forward to hearing from you.

Sincerely,

Margot Monson, aquatic entomologist.

Townley, Jill (DNR)

From: Paul Moore <paulmoore114@gmail.com>
Sent: Thursday, August 30, 2012 1:19 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Paul Moore
1388 Goodrich Ave
St. Paul, MN 55105

Fay, Lisa (DNR)

From: mary moriarty <mimoriarty@earthlink.net>
Sent: Saturday, September 01, 2012 8:43 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 "Western Pit Progression" at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands.
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. U.S. Steel has a long history of non-compliance.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac's cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

mary moriarty
3885 Niagra Ln N
plymouth, MN 55446

Fay, Lisa (DNR)

From: Mary Munn <mlmunn@cpinternet.com>
Sent: Thursday, August 30, 2012 9:27 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

do your job & give the land back to the tribes

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
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- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel's long history of non-compliance, it is reasonable to expect that permits won't prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac's cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Mary Munn

498 CO RD 8
Holyoke, MN 55749

Townley, Jill (DNR)

From: Rosie Neber <jessedog1214@yahoo.com>
Sent: Thursday, August 30, 2012 3:03 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
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- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Rosie Neber
1715 Pleasant St.
Lauderdale, MN 55113

Townley, Jill (DNR)

From: Judy Nelson <kjrcnelson@peoplepc.com>
Sent: Thursday, August 30, 2012 8:35 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Judy Nelson
54 Helberg Road
Esko, MN 55733

Townley, Jill (DNR)

From: Richard Nethercut <richard@ranlaw.net>
Sent: Thursday, August 30, 2012 2:08 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Richard Nethercut
14083 County 23
Canton, MN 55922

Townley, Jill (DNR)

From: Marie Nickell <prosperplayhouse@mabeltel.coop>
Sent: Friday, August 31, 2012 9:53 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I'm writing to request the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Marie Nickell
10526 County 113
Mabel, MN 55954

Townley, Jill (DNR)

From: Christopher Norbury <ChiTrader@yahoo.com>
Sent: Thursday, August 30, 2012 1:56 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Christopher Norbury
2175 Sunflower Lane
Owatonna, MN 55060

Townley, Jill (DNR)

From: John Oberholtzer <jober@boreal.org>
Sent: Friday, August 31, 2012 11:22 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

John Oberholtzer
184 W Deeryard
Lutsen, MN 55612

Townley, Jill (DNR)

From: Madonna Ohse <mdohse@justice.com>
Sent: Sunday, September 02, 2012 3:24 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Madonna Ohse
48 E. Penton Blvd.
Duluth, MN 55808

Townley, Jill (DNR)

From: Alan Olander <aolander@arvig.net>
Sent: Thursday, August 30, 2012 4:30 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Alan Olander
25998 277th Avenue
Nevis, MN 56467

Townley, Jill (DNR)

From: Richard Olson <aromolson@gmail.com>
Sent: Saturday, September 01, 2012 4:59 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
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- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Richard Olson
45 University Ave SE
Minneapolis, MN 55414

Townley, Jill (DNR)

From: Greg Overlid <goverlid@usiwireless.com>
Sent: Tuesday, September 04, 2012 8:36 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Greg Overlid
4505 33rd Ave S
Minneapolis, MN 55406

Townley, Jill (DNR)

From: Dudley Parkinson <dudleyparkinson@me.com>
Sent: Thursday, August 30, 2012 6:56 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Dudley Parkinson
220 7th St. E.
Hastings, MN 55033

Townley, Jill (DNR)

From: Gaius Poehler <gaiuslove@yahoo.com>
Sent: Thursday, August 30, 2012 11:59 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,
Gaius Poehler

Gaius Poehler
476 Herschel St Apt 10
Saint Paul, MN 55104

Townley, Jill (DNR)

From: Robin Poppe <robin.poppe@co.pine.mn.us>
Sent: Thursday, August 30, 2012 2:42 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Robin Poppe
3249 Sandy Pines Rd
Barnum, MN 55707

(200' or there)

Fay, Lisa (DNR)

From: Jim Porter <hskerdad@gmail.com>
Sent: Thursday, August 30, 2012 12:51 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jim Porter
26334 Indigo Dr
n/a

Park Rapids, MN 56470

Townley, Jill (DNR)

From: Truman and Noelyn Porter <tnporter@usfamily.net>
Sent: Saturday, September 01, 2012 9:28 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Truman and Noelyn Porter
1640 Eleanor Ave.
St. Paul, MN 55116

Townley, Jill (DNR)

From: Sue and Mike Prom <sue@canoeit.com>
Sent: Thursday, August 30, 2012 2:07 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Sue and Mike Prom
189 Sag Lake Trail
Grand Marais, MN 55604

Townley, Jill (DNR)

From: Rebecca Ramsden <r Ramsden51@yahoo.com>
Sent: Thursday, August 30, 2012 4:07 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Rebecca Ramsden
1631 Hartford Ave
St. Paul, MN 55116

Fay, Lisa (DNR)

From: John Reichensperger <klmncic@frontiernet.net>
Sent: Friday, August 31, 2012 7:43 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will destroy 4,002 feet of streams, destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres.
- Plans must be made to mitigate either the cumulative destruction of streams and wetlands.
- Violation of permits and water-quality standards cannot continue.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

John Reichensperger
1199 Minn Blvd
Ely, MN 55731

Townley, Jill (DNR)

From: Tom Reinke <treinke1963@gmail.com>
Sent: Friday, August 31, 2012 12:20 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Tom Reinke
420 Jefferson Ave S
Hopkins, MN 55343

Fay, Lisa (DNR)

From: Doretta Reisenweber <dorierduluth@hotmail.com>
Sent: Thursday, August 30, 2012 4:11 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I urge the Minnesota Department of Natural Resources develop an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For far too many years, Minntac has been allowed to expand willy nilly, and thus to destroy streams and wetlands, to violate water quality standards, and to disrupt the hydrology of the Lake Superior Basin. If an EIS were written, it would be able to make sure that far-reaching damage from this proposed Expansion would be minimized and reduced. The facts are that:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Combined the impacts of this Expansion and previous Minntac mining activities, ALL, that is right---100 percent---of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. That is beyond the 76 acres of wetlands impacts from the 2011 "Western Pit Progression" at Minntac and the loss of 275 acres of wetlands due to expansion in 1996.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel's long history of non-compliance, it is reasonable to expect that permits won't prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Doretta Reisenweber
111 Garden Street

Duluth, MO 55812

Townley, Jill (DNR)

From: Michael Rice <mRice@thinkus.net>
Sent: Friday, August 31, 2012 11:39 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Michael Rice
320 Georgia Avenue North
Golden Valley, MN 55427

Townley, Jill (DNR)

From: Robert Robbins <bobrobbins2@gmail.com>
Sent: Friday, August 31, 2012 11:38 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Robert Robbins
16231 Jarvis St NW
Ramsey, MN 55330

Townley, Jill (DNR)

From: Jessica Rocheleau <lovetwolves@yahoo.com>
Sent: Thursday, August 30, 2012 2:14 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jessica Rocheleau
9470 Ranchview Ln.
Maple Grove, MN 55369

Townley, Jill (DNR)

From: Jean Ross <jfross@umn.edu>
Sent: Thursday, August 30, 2012 3:20 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jean Ross
3624 Bryant Ave. S.
Minneapolis, MN 55409

Fay, Lisa (DNR)

From: Stephen Rossiter <rossiter1@gmail.com>
Sent: Tuesday, September 04, 2012 11:00 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,
Stephen Rossiter

Stephen Rossiter
74 West Golden Lake Road
Circle Pines, MN 55014

Townley, Jill (DNR)

From: Gary Rost <garyadguard-organiccon1@yahoo.com>
Sent: Friday, August 31, 2012 10:18 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Gary Rost
1776 Arona Street
Falcon Heights, MN 55113

Townley, Jill (DNR)

From: John Paul Roy <jpack9@usiwireless.com>
Sent: Thursday, August 30, 2012 7:04 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

John Paul Roy
3231 37th Ave. So.
Minneapolis, MN 55406

Townley, Jill (DNR)

From: Carl Sack <northlandiguana@gmail.com>
Sent: Tuesday, September 04, 2012 9:05 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Carl Sack
514 E Washington Ave. Apt. 2
Madison, WI 55806

Fay, Lisa (DNR)

From: Craig Samson <samsonwest111@hotmail.com>
Sent: Sunday, September 02, 2012 12:01 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

As a native Minnesotan and someone who spent many a summer at the family cabin in Hovland, Mn, I am deeply concerned that the MDNR seems to be more concerned with the mining interests than the public's interests. The public deserves an EIS done for the Minntac expansion. Anyone who has been around the mining country has seen the results of careless mining practices, and with all the scrutiny that has been brought to the system with the Polymet project, it seems only fair to the public that Minntac and any other mining project should be held to just as much review. Anything less will only end up costing both the environment and the taxpayer in the end.

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced.

Sincerely,

Craig Samson

Craig Samson
153 CARY LN
POMONA, CA 91767

Townley, Jill (DNR)

From: Gail Sand <denoflioness@yahoo.com>
Sent: Saturday, September 01, 2012 9:10 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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Sincerely,

Gail Sand
P O Box 486
Mound, MN 55364

To: Minnesota Department of Natural Resources
Division of Ecological and Water Resources
Attn: Lisa Fay
500 Lafayette Rd. Box 25
St. Paul, MN 55155-4025

Re: <http://www.dnr.state.mn.us/input/environmentalreview/minntac/index.html>

Minntac Mine Extension Project Environmental Assessment Worksheet (EAW)

These comments are being submitted by Save Our Sky Blue Waters and the Save Lake Superior Association. We are local northeast Minnesota grassroots organizations who have been following the issue of copper-nickel sulfide mining in northeast Minnesota. Our research of the potential pollution to be caused by the opening of a sulfide mining range in northeast Minnesota has brought to our attention the current pollution problems being created by taconite mining, and the inability of our state agencies to uphold current laws and standards designed to protect our water, air, and health.

We are aware of the fact that Minntac's existing tailings basin is leaching sulfates into two watersheds, and the DNR has no solution for halting or cleaning-up existing contamination. The release of sulfates and heavy metals is ruining native stands of wild rice, and is contributing to the bio-accumulation of mercury in fish and any person, bird, or animal eating those fish. Air emissions are contributing to haze over scenic and protected areas, and are no doubt contributing to increasing rates of asthma, allergies, cancers, and bronchial diseases in the human population.

The expansion of mining, as spurred by global demand, continues to eat up our forests and wetlands, while altering our watersheds. At the same time, taconite mining leaves behind toxic tailings, and industrial sites, dikes, and waste rock piles that make the environment unfit for future uses. We can no longer continue to ignore this footprint.

BURDEN OF PROOF

The burden of proof in reviewing the permit issued by the DNR and the State of Minnesota needs to be adjusted to reflect the DNR's financial interest as an industry participant. The DNR leases property to mining companies. This includes the land that the State of Minnesota is holding for leasing to mining companies, which in St. Louis County alone amounts to 930,000 acres. The DNR is not impartial as an industry participant; the DNR relies on mining as a funding source, and the Lands and Minerals Division actively promotes development of mining.

Whatever sulfides the EAW report is claiming, it is clear that Minntac's sulfate problems, which are a product of sulfides and acid rock drainage, are increasing as the company digs deeper and

to the south as indicated by increases in tailings basin sulfates on page 38 of the following DNR report <http://www.miningminnesota.com/uploads/SO4paperProgReport 7 2008 3 .pdf>.
References: Paragraph 4, page 29, "mine pit deepens." Page 4 top paragraph-in pit stock piles increased by up to 170 feet etc. indicate an in pit scouring of sulfide prior to processing which will dramatically increase sulfides in pit pumped water to two rivers.

Because the Minntac expansion is high in sulfides which will release ever increasing amounts of sulfates and heavy metals, any mining expansion requires an EIS and the scrutiny of a sulfide mine.

WILDLIFE

The Minntac expansion will exacerbate the sulfate polluted corridor from Birch Lake down the Embarrass River through the St. Louis River Watershed, contaminating a food supply that includes wild rice and fish. This contamination will ultimately affect migratory birds which are dependent on these food sources, and constitutes a violation of the Migratory Bird Treaty Act. The already acidic condition of the St. Louis River is indicated by fish consumption advisories that indicate a fragile condition that cannot sustain more loading of these substances.

THE EFFECT OF THE POLLUTION OF THE ST. LOUIS RIVER ON AGRICULTURE

The St. Louis River valley was once a prosperous farming region. The decline in farming seems to have coincided with the expansion of taconite mining. The rich and fertile land is still there, but the farmers and farming are missing. Two things that are different are a tax policy that favors the tax forfeiture of land to the State to obtain mineral interests for the benefit of mining companies - and the pollution of the river.

Tax policy and pollution have strangled the agricultural economies of the towns of Cherry, Toivola, Meadowlands, and Brookston along the St. Louis River. No one is enforcing the law to stop the pollution of the river and the destruction of this aspect of the economy. Minntac expansion will prolong and intensify the crippling of the St. Louis River agricultural economy.

WATER QUALITY AND LAW

The additional pollutants combined with the already poor health of the river will cause problems for the St. Louis River Estuary, and it is foreseeable that it could contaminate drinking water out into Lake Superior. The contamination of the St. Louis River is a civil legal violation of the riparian water rights of the downstream water users for drinking, recreational, agricultural, and other purposes. This contamination is not merely regulatory or administrative. It is a violation of common law, a taking without compensation by State government. If expansion is permitted, it is a violation of the Great Lakes Compact and NEPA.

Experience of the MDNR and MPCA has shown at the Soudan Mine site that proper treatment of mine water is unavailable. The DNR remains out of compliance with legal emission standards for copper, cobalt, and mercury. A similar non-compliance situation is being allowed to exist at the LTV tailings basin.

Chemical precipitation/bioremediation has failed at other sites as well. Even if bioremediation is successful in neutralizing acid and precipitating out heavy metals, it results in a release of arsenic and other toxic substances and never sequesters methyl mercury that becomes toxic to fish and humans. Some dangerous heavy metals, including nickel, because of their solubility, remain in the water even after acid neutralization and precipitation occurs.

As taconite ore is depleted the amount of sulfides released from mining will only increase. In the early '80's, St. Scholastica adjunct professor Jack McGrath, Senior-Vice President at Minnesota Power, stated that the only taconite mine with an enduring supply of taconite reserves was Minntac. However, he indicated that at some point in the early 21st century, this would encounter an overlay of sulfide bearing rock in the formation and that this would present pollution that would be intolerable to the public.

AIR POLLUTION

Haze over Superior National and surrounding Forest is treated as simply a matter of aesthetics, but this form of air pollution, caused by mining and power production in support of mining, has been inadequately studied, especially in regard to human health.

Further study needs to be done regarding the impact on migratory birds and native wildlife, to avoid a violation of treaty rights and international law.

Contrary to the indication on page 38 that there would be no net burden on air quality, the digging of a deeper pit and a longer hauling distance would entail more use of hauling and digging machinery and fuel.

CUMULATIVE IMPACTS AND CURRENT NON-COMPLIANCE

More information needs to be provided on the Atkins CERCLIS/SUPERFUND site indicated on the bottom of page 8 and the Iroquois CERCLIS/Superfund site indicated on page 9 of the EAW. It is unconscionable simply to dismiss these because there is no active investigation or clean-up as there are clear indications of problems in the area.

The self serving leasing being conducted by the DNR department of lands and minerals is threatening to create a corridor of contamination from Grand Lake Township to International Falls, with much of this threat overlapping that which will be affected by the Minntac expansion.

HYDROLOGY AND WOODLANDS

The EAW underestimates the effect of the cone of depression. Drying out of soils indicates that trees depending on those soils die with the dry out. Trees hardy to drying out are more susceptible to fire. Increasing the risk of fire increases the threat of forest fire and endangers jobs in forestry and tourism. Indigenous vegetation is what migratory animals depend on during their migration. Even though corridors for physical migration exist, a lack of food creates an impediment and threatens the migration and the animals that need to range for food.

NATIVE AMERICAN RESOURCES AND VALUES

High levels of sulfates emitted by taconite mining have, according to existing law and scientific standards, killed all of the wild rice beds in all locations within the St. Louis River watershed downstream from mine water discharges. This grain has sustained native American tribes for centuries and is considered a sacred staple of their diet. We are what we eat. Increasing discharges of sulfates threaten Lake Superior rice beds that wildlife and native tribes depend on for sustenance. These are hunting and gathering rights guaranteed by law in treaties, treaty rights being a primary law that supersedes legislation.

Also threatened and already made poisonous by mine runoff are the fish. Fish consumption advisories have already spoiled the St. Louis River fishery for consumption by native and non-native indigenous populations. Specifically violated are the fishing rights of the Fond du Lac Band. Also violated are their riparian water rights through a taking by the mining companies of water for taconite processing but also the contamination of fugacious river water beneath their riparian lands.

ENVIRONMENTAL JUSTICE

Over more than one hundred years mining companies and their employees have at the expense of people in the surrounding communities caused the wasting of land in violation of the Rule of Perpetuities, polluted water for generations yet to come, sickened and poisoned for consumption fish and other produce of the land for agriculture, generated noise from blasting and train transportation, and consumed a disproportionate quantity of natural resources in creating wealth for themselves at the expense of the public.

Expansion at Minntac will violate the law by creating unpermitted discharges, will exceed the 10ppm sulfate standard, will poison waterfowl in violation of the Migratory Bird Act, will violate the legal rights of riparian water users, and other law. We are supposed to be setting an example that we are a country of laws. It is obvious that politicians are seeking to change laws for the benefit of a single industry rather than uphold our laws as an example.

MORE DESIRABLE ECONOMIC ALTERNATIVES

The alternative to sulfide mining is for the State of Minnesota to raise revenue by selling the mineral interest that they hold on millions of acres in Minnesota back to the surface estate owners will increase property values and lead to a stabilization of environmental conditions more conducive to attracting non-mining business and promote the stated goal of the IRRRB to diversify the economy. Many miles of river front land have been devalued by mining pollution and expansion, shrinking local government tax bases. These losses will be intensified and broadened by mining expansion. The tax losses have been shifted to innocent non-mining businesses in the area, some of which have failed as a result of the shift or been discouraged from starting up.

In conclusion, taconite mining expansion at Minntac should not go forward. A complete EIS should be required to address the many issues known regarding current taconite mining. To do otherwise is an injustice to the residents of the Iron Range and the Arrowhead Region.

Submitted by:
Save Our Sky Blue Waters
Elanne Palcich
29 SE 5th St.
Chisholm, MN 55719

Save Lake Superior Association
LeRoger Lind
2948 E. Castle Danger Road
Two Harbors, MN 55616
218-834-6137

Townley, Jill (DNR)

From: Barbara Saykally <saykallyb@yahoo.com>
Sent: Sunday, September 02, 2012 9:27 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Barbara Saykally
37445 Gold Finch Drive
Winona, MN 55987

Townley, Jill (DNR)

From: Elizabeth Schaefer <retlibrn@earthlink.net>
Sent: Saturday, September 01, 2012 6:21 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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Sincerely,

Elizabeth Schaefer
4655 Victoria Dt N
Shoreview, MN 55126

Townley, Jill (DNR)

From: David Schaenzer <schaedave@aol.com>
Sent: Friday, August 31, 2012 3:28 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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Sincerely,

David Schaenzer
2456 west 24th street
minneapolis, MN 55405

Townley, Jill (DNR)

From: Laura Schauland <tilly.tornado@yahoo.com>
Sent: Friday, August 31, 2012 11:52 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Laura Schauland
9609 Arrowhead Rd.
Isabella, MN 55607

Townley, Jill (DNR)

From: Lance Schlimgen <lance.schlimgen@gmail.com>
Sent: Thursday, August 30, 2012 12:55 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Lance Schlimgen
5916 45th Ave N

Crystal, MN 55422

Townley, Jill (DNR)

From: Nancy Schultz <nshultz@compassrose-inc.com>
Sent: Tuesday, September 04, 2012 8:56 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Nancy Schultz
748 Amber Drive
Shorview, MN 55126

Townley, Jill (DNR)

From: Melissa Siebke <m_siebke@yahoo.com>
Sent: Thursday, August 30, 2012 5:41 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
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- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Melissa Siebke
2201 Village Lane # 401
Minneapolis, MN 55431

Sierra Club Northstar Chapter
&
Center for Biological Diversity

Lisa Fay, Planner Principal
Environmental Review Unit
MDNR Division of Ecological and Water Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4025

September 5, 2012

RE: Minntac Mine Extension Project Environmental Assessment

Thank you for providing this opportunity to comment on the Minntac Mine Extension Project Environmental Assessment (EA). The comments herein are submitted on behalf of the Sierra Club North Star Chapter and the Center for Biological Diversity. The Sierra Club is a non-profit environmental organization with several thousand members in Minnesota. The Center for Biological Diversity is a non-profit conservation organization with hundreds of members in Minnesota and an office in Duluth, Minnesota. We participate in the administrative process to encourage environmental health and sustainability, long term wildlife and habitat protection and biodiversity goals. Due to the potential environmental effects resulting from this project and the many important specifics that are missing from this document, an Environmental Impact Statement (EIS) must be prepared.

Mining results in environmental damage to our land and water resources. Water is one of our most precious commodities, what's best for Minnesota's water is also what's best for Minnesota's economy, health and well-being of Minnesota's citizens and future generations. The EA states that it is likely that additional ore reserves in the area will be mined in the future. This looks to be a very bleak future for the surrounding environment in this part of Minnesota. Having endured mining for the last 50+ years, now the Minntac mine is proposing expansion and further mining for the next 30 years, in addition to the possibility of even further expansion of mining beyond that. It is the DNR's responsibility to care for and protect Minnesota's environment. As our unique ecosystems are increasingly threatened by climate change, deforestation, invasive species, mining and loss of species it is more important than ever to protect what is left. It is not in the public interest to allow the proposed mining activities to take place when the risk of severe environmental damage is so great.

The EA is missing many important details and specifics regarding this project. Without crucial details there is inadequate discussion of effects to the environment. The EA states, "Detailed information about the schedule and implementation of the proposed mine extension has not yet been developed. A detailed mine model and stockpiling plan will be included in the forthcoming application to the DNR for the Permit to Mine Amendment" (45). An in-depth analysis of how project operations and their specific locations may affect important resources such as water, soil and species must be completed. The EA states, "The forthcoming Permit to Mine Amendment will include discussion of measures to prevent or minimize potential environmental problems associated with the proposed extension and roadway relocations related to geology or soil conditions. Methods for stockpiling, volumes, and stockpile locations will be addressed" (34). An EIS must be prepared to provide missing information and detailed specifics of this project so that the public may view more finalized plans and be given the opportunity to comment.

The EA states, "Indirect impacts associated with the Extension will be addressed by the USACE Section 404 Wetlands Permit for the project. If it is determined that wetlands adjacent to the Extension area are being detrimentally impacted by the activity, U.S. Steel – Minntac shall provide corrective measures and/or compensatory mitigation as determined by the Minnesota DNR and/or USACE at that time. No studies of the indirect wetland impacts from the current mine have been completed" (18). The specifics of the Section 404 permit and how this project will comply with it need to be disclosed. For instance, the EIS must address how this expansion and its impacts on wetlands would comply with the Clean Water Act Section 404 requirements and guidelines. 40 C.F.R. § 230.10. Also, the EIS must include the stream assessment of Parkville Creek, within the USACE environmental impact assessment (EIA), as well as the Aquatic Biota Evaluation and the Stream Morphology Assessment.

The EA states, "In addition to the direct loss of stream habitat, impacts to downstream water bodies (including downstream public waters) will also occur as the natural hydrology of the area is changed. Contributing watershed areas can be severed or completely removed due to mining activity, directly affecting runoff from precipitation and resultant streamflow" (19). It is important to protect water resources from negative impacts due to mining activities. There is great concern over loss of stream habitat, particularly the removal of part of Parkville Creek, changes to the natural hydrology of the area and negative impacts to downstream water resources.

Mining activities have the potential to harm fish populations in streams and wetlands. The EA states, "Groundwater level changes, loss of wetlands, loss of headwater stream portions, and alteration of sediment transport contribute to hydrological and habitat change in tributaries such as the West Two Rivers and Parkville Creek. Decreased flow in the spring in particular can negatively impact northern pike spawning success. Changes in sediment transport, from either increased or decreased flow, can alter the geomorphology and stream habitat. Increased sedimentation usually results in a decrease in quality fish habitat" (12). The Sierra Club and the Center for Biological Diversity are concerned that the proposed mining activities will further harm many aquatic species. The EA states, "Loss of habitat in the tributaries can impact the resident fish but also can negatively impact downstream fisheries. Northern pike and white sucker populations may be impacted as they likely move between the West Two Rivers Reservoir and the tributaries, particularly for spawning. Fish movement, i.e. immigration into the reservoir, is prevented by the reservoir dam so the upstream habitat is especially important for maintaining the population of these two species and others" (12).

The Sierra Club and the Center for Biological Diversity are concerned with the loss of wetlands, in particular the loss of the cattail marsh adjacent to Parkville Creek. Not only will there be a loss of wetlands but there is also potential that mine pit dewatering will impact wetlands and streams as the cone of depression extends further and lowers overall groundwater levels. No impacts to wetlands can be allowed to occur until full compliance with Section 404 of the Clean Water Act has been demonstrated. The EA further states that there have not been any studies conducted to find out what sort of effects mining has had on wetlands in the area. It is critical to examine this issue before proceeding so that if negative effects are occurring mitigations can be implemented to assure that expanding mining activities will not cause additional harm to wetlands.

Water systems are fragile, interconnected ecosystems. Even small disturbances such as changes in temperature and rates of flow can have far reaching consequences. There is concern that many aquatic areas will be negatively impacted by this project. Of particular concern is

Parkville Creek. The EA states, "While mine pit dewatering discharge will replace some of the natural flow that is lost, downstream water bodies may also be impacted by the "cone of depression" that results from pumping, particularly groundwater-fed streams and water bodies. All of these changes could impact fisheries in the streams to be removed as well as in downstream waters" (12). It is important to continue monitoring all water resources connected to the area, especially West Two River and the St. Louis River and to not allow projects to proceed unless the project proponent can demonstrate that the project will fully comply with state water quality standards and the Clean Water Act.

Planned mining expansion activities will also impact several areas of shoreland. The EA states, "The proposed project would impact approximately 0.25 acres of the 300-ft shoreland zone of McQuade Creek (aka Kinney Creek) and approximately 0.48 acres of the 1,000-ft shoreland zone surrounding Yates Lake (Figure 6b). Based on pre-design assumptions for CSAH 102 relocation, up to 3.5 acres of shoreland zone surrounding Parkville Creek would be impacted. However, these impact areas may be reduced based on final design, which would be described in more detail during the project permitting process" (27). Shorelines must be protected and further information regarding shorelines and final design plans must be included in an EIS.

The Sierra Club and the Center for Biological Diversity are also greatly concerned with expansion plans for the tailings basin, as it is our understanding that the current tailings basin has already resulted in numerous violations of water quality standards. The EA states that, "The Minntac tailings basin is currently classified by Dam Safety as a class iii, or "Low Hazard" Dam. This classification may no longer be appropriate and a hazard class review is needed (4)". This issue needs to be explored further and more complete details must be provided in an EIS.

It is important for the DNR to assure that water resources are protected from contamination. The EA states, "Though sulfides (such as pyrite) are present in only small amounts in the L.S., it is acknowledged that sulfate levels in the tailings basin have become problematic for seepage discharged to the environment. This situation is an existing issue that will continue to be addressed through ongoing water quality permitting, whether or not the proposed extension project is implemented. DNR Lands and Minerals and the MPCA are currently exploring if materials handling/stockpiling at the site could be managed in such a way that reductions in sulfate levels could be achieved. The manner in which materials are handled/stored could reduce or avoid long term generation and release of sulfate. Potential changes in operations related to materials handling/stockpiling could become requirements or conditions incorporated into the Permit to Mine Amendment if and when it is issued for the extension project" (33). Full disclosure of the Schedule of Compliance concerning violations to the NPDES/SDS Permit No. MN 0052493 must be included in an EIS. Discussion of how these problems will be affected by expansion plans also must be included. Furthermore, an assessment of the cumulative impacts that sulfates have had to surrounding watersheds, including impacts to areas where wild rice is grown, must also be done.

There is great concern over sulfate seepage into the environment through the tailings basin. There should be no releases of dangerous sulfates into the surrounding environment. Until this hazardous problem is fixed, considerations for expansion must be put on hold. Any plans for expansion must demonstrate that sulfates are currently not escaping into the environment and will continue to not escape if expansion plans are implemented.

The EIS must also address and disclose the full extent of past violations of Minnesota's sulfate standard for wild rice waters resulting from this mine, and explain how the proposed expansion will not result in further violations of this mandatory water quality standard.

Moreover, area streams are already impaired due to past and existing mercury pollution. The EIS must also address and disclose how this mine expansion would not contribute to additional mercury pollution in streams that are already designated as water quality limited under Section 303(d) of the Clean Water Act, 33 U.S.C. § 1313(d).

Lastly, the Sierra Club and the Center for Biological Diversity are troubled with this projects reduction in potential lynx habitat. The Canadian lynx is a federally listed threatened species. Land managers must work to conserve and recover the lynx by maintaining and improving habitat. The EA states, "Based on preliminary survey, the proposed mine extension could affect lynx found in the vicinity of the project site, but would not adversely affect lynx populations or their critical habitat. Lynx likely do not reside in the project area. However, lynx could travel through the area and it is reasonably foreseeable that project activities could impact movements through the area or cause accidental mortality" (15). Take of lynx – accidental or otherwise – is prohibited by Section 9 of the Endangered Species Act. 16 U.S.C. § 1538.

Thank you for considering our comments, and please keep us notified if this project continues to move forward.

Sincerely,

The Sierra Club North Star Chapter
2327 East Franklin Avenue, Suite 1
Minneapolis, MN 55406-1024

Lori Andresen
Andres01@charter.net

Annah Gardner
AJGardner@stthomas.edu

Center for Biological Diversity
209 East 7th St.
Duluth, MN 55805
218-525-3884

Marc Fink
mfink@biologicaldiversity.org

Townley, Jill (DNR)

From: Dwight Smith <danddsmith123@gmail.com>
Sent: Sunday, September 02, 2012 9:53 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Dwight Smith
2285 Brooke Lane
Hastings, MN 55033

Townley, Jill (DNR)

From: Mary Smith <blaureiterhorse@yahoo.com>
Sent: Thursday, August 30, 2012 1:22 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Mary Smith
13998 165TH ST.
LITTLE FALLS, MN 56345

Townley, Jill (DNR)

From: Noah Smith <noahmnmusic@hotmail.com>
Sent: Thursday, August 30, 2012 5:11 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Noah Smith
Sherwood
Saint Paul, MN 55119

Townley, Jill (DNR)

From: kathleen spencer <kaspencer2@yahoo.com>
Sent: Friday, August 31, 2012 1:30 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

kathleen spencer
315 N Lake Ave #229
Duluth, MN 55806

Townley, Jill (DNR)

From: DeeAnn Stenlund <deeannstenlund@hotmail.com>
Sent: Thursday, August 30, 2012 7:59 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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Sincerely,

DeeAnn Stenlund
2687 Matilda St
Roseville, MN 55113

Townley, Jill (DNR)

From: Cynthia Stimmler <cstimmler@gmail.com>
Sent: Monday, September 03, 2012 8:45 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Cynthia Stimmler
1087 240th Street
Dresser, WI 54009

Townley, Jill (DNR)

From: jon stoike <jsshuk@yahoo.com>
Sent: Tuesday, September 04, 2012 1:17 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
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Sincerely,

jon stoike
rte 4
northfield, MN 55057

Fay, Lisa (DNR)

From: Melvin Strand <mls2@myclearwave.net>
Sent: Thursday, August 30, 2012 4:02 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:
MY environment needs protecting. Yes, my environment, not just that of big money.

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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Sincerely,

Melvin Strand

13342 382nd Avenue
Waseca, MN 56093

Townley, Jill (DNR)

From: Melinda Suelflow <melindasuelflow@gmail.com>
Sent: Thursday, August 30, 2012 5:03 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

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Sincerely,

Melinda Suelflow
6722 Park Hill Road
Finland, MN 55603

Townley, Jill (DNR)

From: jean sutton <jeanwsutton@gmail.com>
Sent: Thursday, August 30, 2012 1:41 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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Sincerely,

jean sutton
5247 york ave. south
minneapolis, MN 55410

Townley, Jill (DNR)

From: Ginny Sweatt <ginny@madotson.com>
Sent: Tuesday, September 04, 2012 9:11 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Ginny Sweatt
3225 Bohns Point Lane
Wayzata, MN 55391

Fay, Lisa (DNR)

From: Dennis Szymialis <shrimpshadow@hotmail.com>
Sent: Monday, September 03, 2012 5:16 PM
To: *Review, Environmental (DNR)
Subject: EAW Comments - Minntac Mine Extension

BURDEN OF PROOF AND STANDARD OF REVIEW FOR EAW

Furthermore, the burden of proof in reviewing the permit issued by the DNR and the State of Minnesota needs to be adjusted to reflect the DNR's financial interest as an industry participant. The burden of proof needs to be reallocated to the DNR to show the truth and accuracy of the EIS claims made. The DNR leases property to mining companies a practice which has continued through the EAW comment period. The DNR is not impartial as an industry participant and it would be unfair to the public and the industry to set a precedent a deferential standard for the DNR. For Example, the DNR will give permitting preference to mines for which they have a lease and will receive a royalty.

Whatever sulfides the EAW report is claiming it is clear that Mintac's sulfate problems which are a product of sulfides and acid rock drainage are increasing as the company digs deeper and to the south as indicated by increases in tailings basin sulfates on page 38 of the following DNR report http://www.miningminnesota.com/uploads/SO4paperProgReport_7_2008_3_.pdf.

References: Paragraph 4, page 29, "mine pit deepens." Page 4 top paragraph-in pit stock piles increased by up to 170 feet etc. indicate an in pit scouring of sulfide prior to processing which will dramatically increase sulfides in pit pumped water to two rivers. Because the Mintac expansion is high in sulfides which will release ever increasing amounts of sulfates and heavy metals it should require an EIS and the scrutiny of a sulfid mine and I hereby adopt by reference comments that I made regarding the Poymet permitting that apply to sulfide mines generally.

I adopt by reference the comments of Tom Power in his testimony before the Minnesota State Legislature.

WILDLIFE

The Mintac expansion will exacerbate the sulfate polluted corridor from Birch Lake down the Embarras River through the St. Louis River Watershed contaminating a food supply for thousands of hunters and fishermen. This contamination will affect all of the states by diminishing and poisoning migratory birds on the Mississippi flyway including all states fronting the Mississippi River.

This activity constitutes a violation of the Migratory Bird Act and other law. The already acidic condition of the St. Louis river as indicated by the sign at the swinging bridge in Jay Cook and the toxic condition as indicated by the fish consumption advisory at the Munger trail bridge indicate a fragile condition that cannot sustain more loading of these substances.

MORE DESIRABLE ECONOMIC ALTRNATIVES

The alternative to sulfide mining is for the state of Minnesota to raise revenue by selling back the mineral interest that they hold on millions of acres in Minnesota back to the surface estate owners and to sell of land that the State of Minnesota is holding for leasing to mining companies which in St. Louis County alone amounts to 930,000 acres. This will increase property values and lead to a stabilization of environmental conditions more conducive to attracting non-mining business and promote the stated goal of the IRRB to diversify the economy. Many miles of river front land have been devalued by mining pollutant contamination shrinking local government tax bases from collection of taxes on what would be higher value properties without the mining. These losses will be intensified and broadened. The tax losses have been shifted to innocent non-mining businesses in the area, some of which have failed as a result of the shift or been discouraged from starting up.

THE EFFECT OF THE POLLUTION OF THE ST. LOUIS RIVER ON AGRI-CULTURE

The St. Louis River valley is a rich and was once a prosperous farming region. The decline in farming seems to have coincided with the iron mining at LTV and processing at UT. The rich and fertile land is still there but the farmers and farming is missing. Two things that are different are a tax policy that favors the tax forfeiture of land to the state to obtain mineral interests for the benefit of mining companies and the pollution of the river.

Tax policy and pollution have strangled the agricultural economies of the towns of Cherry, Toivola, Meadowlands, and Brookston along the river. Meadowlands was once a thriving community with car dealerships, implement dealerships, a bank, a cheese factory, and more. All this is gone. People in the area are disgusted by the condition of the river. It is so bad that no one would consider swimming in it. If you wouldn't swim in it how could you expect your dairy cow to drink from it or why would you irrigate your crops with it? The Embarrass River valley has been condemned for agricultural activity. No one is enforcing the law to stop the pollution of the river and the destruction of this aspect of the economy that once employed hundreds. Mintac expansion will prolong and intensify the crippling of the St. Louis River agricultural economy.

WATER QUALITY AND LAW

The additional pollutants combined with the already poor health of the river will cause problems for the St. Louis River Estuary, and it is foreseeable that it could contaminate our drinking water out into Lake Superior. The contamination of the St. Louis River is a civil legal violation of the riparian water rights of the downstream water users for drinking, recreational, agricultural, industrial, and other purposes. This contamination is not merely regulatory or administrative, it is a violation of common law, a taking without compensation by state government if the project is permitted, a violation of the Great Lakes Compact, a violation of the NEPA law and other law. The permitting of pollution of Minnesota waters to the detriment of downstream users given the vast holdings of the State of Minnesota of Mineral interests for lease, its entrenched relationship in the industry, subsidies given or allowed by the State of Minnesota, and equity owned by Minnesota officers constitutes an unconstitutional taking without compensation and not for a public or legal purpose. The pollution from the Mintac toxins will end up in our Duluth/Superior drinking water destroying our health and our prosperity.

Experience of the MDNR and MPCA has shown at the Soudan Mine sight that proper treatment of mine water is unavailable. The DNR stipulated to the payment of a ten thousand dollar fine to the MPCA, agreed to pay for a twenty-five thousand dollar supplemental environmental project, and put ninety thousand dollars in escrow for future non-compliance related fines. The DNR remains out of compliance with legal emissions standards for copper, cobalt, and mercury. A similar non-compliance situation is being allowed to exist at the LTV tailings basin. A Study conducted initially in Sweden, replicated by Canada, and a college in Minnesota showed that the addition of Sulfides to a swamp stimulates the production of methylated mercury for which fish consumption advisories have already been issued.

Chemical precipitation, a.k.a. bioremediation, has failed at other sight as well. At the Buck/Dober mine complex in Iron River/Caspian the discharged water has left a trail of metal precipitate leading to the Iron River and is clearly failing from a simple visual inspection of the sight. Even if bioremediation is successful in neutralizing acid and precipitating out heavy metals it result in a release of arsenic and other toxic substances and never sequesters methyl mercury that becomes toxic to fish and humans. Some dangerous heavy metals like nickel because of there solubility remain in the water even after acid neutralization and precipitation occurs.

As taconite ore is depleted the amount of sulfides released from mining will only increase. It was related to our class at the College of St. Scholastica in the early '80's by adjunct professor Jack McGrath, Senior-Vice President at Minnesota Power, that the only taconite Mine with an enduring supply of taconite reserves was Minntac. However, he indicated that at some point in the early 21st century this would encounter an overlay of sulfide bearing rock in the formation and that this would present pollution that would be intolerable to the public.

AIR POLLUTION

The hazing of the Superior National and surrounding forest is treated as simply a matter of aesthetics but this form of air pollution caused by mining and power production in support of mining has been inadequately studied. As a child I observed large clusters of Monarch Butterflies' during summer months. These numbers have diminished to the extent that I am able to observe very few in multiple years. More study needs to be done on the effect of air pollution on these and other primary pollinators including

honey bees.

Monarchs have a migration that takes them 900 miles into Mexico. The indigenous population of Mexico celebrate this migration as the day of the Dead and regard the butterflies as manifestations of their ancestors. Northern Minnesota, Wisconsin, and Michigan where mining projects are predominant compose the majority of the northern habitat. Little study has been done on the northern habitat. In Mexico, forests where the butterflies congregate are protected by law. Their migration provide for a modest income for an indigenous population through tourism. Further study needs to be done in consultation with the U.S. Secretary of State to avoid a violation of treaty, international law, and a failure of diplomacy.

Contrary to the indicated on page 38 that there would be no net burden on air quality, the digging of a deeper pit and a longer hauling distance would entail more use of hauling and digging machinery and fuel.

CUMULATIVE IMPACTS AND CURRENT NONCOMPLIANCE

More information needs to be provided on the Atkins CERCLIS/SUPERFUND cite indicated on the bottom of page 8 and the Iroquois CERCLIS/Superfund cite indicated on page 9 of the EAW. It is unconscionable simply to dismiss these because there is no active investigation or clean-up as they are clear indications of problems in the area.

It needs to be considered the prospects of the impending school trust legislation that congressional representatives in Minnesota are proposing that will exempt from EIS scrutiny.

It needs to be considered self serving leasing being conducted by the DNR department of lands and minerals that threaten a corridor of contamination from Grand Lake Township to International Falls and in other parts of the state with much of this threat overlapping that which will be affected by the Mintac expansion.

HYDROLOGY AND WOODLANDS

The EAW underestimates the effect of the cone of depression. Drying out of soils indicates that trees depending on those soils die with the dry out. Trees hardy to drying out are more susceptible to fire. Increasing the risk of fire increases the threat of forest fire and endangers our logging industry. Indigenous vegetation is what migratory animals depend on during their migration. Even though corridors for physical migration exists, a lack of food creates an impediment just the same and threatens the migration and the animals that need to range for food.

UNCONSTITUTIONAL IMPEDIMENT TO COMMERCE

Current discharges of sulfate from Mintac and other mines have saturated the sediments of the Duluth/Superior Harbor leading to the untimely deterioration of docks, bulkheads, piers, and other structures used in interstate commerce and the allowance of continued discharge of sulfates constitutes a violation of the Commerce Clause of the constitution since these structures are used in and necessary to the commerce of a number of other states besides Minnesota.

NATIVE AMERICAN RESOURCES AND VALUES

High levels of sulfates emitted by taconite mining have, according to existing law and scientific standards, killed all of the wild rice beds in all locations within the St. Louis River watershed downstream from mine water discharges. This grain has sustained native american tribes for centuries and is considered a sacred staple of their diet. We are what we eat. Increasing discharges of sulfates threaten Lake Superior Rice beds that wildlife and native tribes depend on for sustenance. These are hunting and gathering rights guaranteed by law in treaties. Treaty being a primary law that supercedes legislation.

Also threatened and already made poison by mine runoff are the fish. Fish consumption advisories have already spoiled the St. Louis River fishery for consumption by native and non-native indigenous populations. Specifically violated are the fishing rights of the FonDuLac Band that not only has to live with a violation of its treaty fishing rights which are more seriously threatened with rising levels of sulfates and methyl mercury. Also violated are their riparian water rights through

a taking by the mining companies of water for taconite processing but also the contamination of fugacious river water beneath their riparian lands.

ENVIRONMENTAL JUSTICE

Over more than one hundred years mining companies and their employees have at the expense of people in the surrounding communities caused the wasting of land in violation of the Rule of Perpetuities, polluted water for generations yet to come, sickened and poisoned for consumption fish and other produce of the land for agriculture, generated noise from blasting and train transportation which threatened road travel and cost lives at intersections, consumed a disproportionate quantity of natural resources in creating wealth for themselves, and countless adverse impacts on behalf of creating wealth for themselves at the expense of the public that pays for their wealth at the expense of the above adverse impacts. It is not fair to people who object to paying this price and have a vision for a better way. A way never given a reasonable opportunity. Employees of Mintac have available to them the prospect of jobs at the ESSAR Taconite which has been permitted and will be opening soon. If they do not avail themselves of this opportunity their employment problems are their own fault.

Expansion at Mintac will violate the law by encouraging unpermitted discharges and pollute the waters of the neighboring state of Wisconsin in violation of the Clean Water Act, will exceed the 10ppm sulfate standard, poison waterfowl in violation of the migratory bird act, violate the legal rights of riparian water users, and other law. These are the kinds of offenses that have led to riots, civil war, and murder by police in countries like Peru, Chile, Indonesian New Guinea, Congo Africa, and others. We are supposed to be setting an example that we are a country of laws. It is no justification that politicians are seeking to change laws for the benefit of a single industry rather a change of laws is simple another act incivility and corruption by our own country.

Again, the DNR acts in a self serving manner by engaging in a study regarding the 10 mg sulfate standard. At a meeting to set the parameters for the study many months ago, Dennis Szymialis brought up the need to evaluate sediment samples for the presence of toxic heavy metals. He postulated that these were actually killing the wild rice and that the sulfates were simply a proxy for the presence of these. He was rebuked by the staff at the MPCA who were at the meeting and none of the 32 person advisory committee came to his assistance. This in spite of the clearly established science that heavy metals like nickel, mercury, and arsenic are just as toxic to plants as to people. Nevertheless the study will analyze sediment samples for metals that are a part of human vitamin supplements like zinc, copper, magnesium, etc. It appears that they want to discount the sulfate standard by using as examples areas where sulfates are found in association with non toxic metals. Again, they seek a result, at public expense toward their self serving ends by manufacturing a phony study.

In whatever iron mining region you visit whether it is in Minnesota, Wisconsin, Alabama, Arizona, Montana, Ohio, Michigan et. al. there will be pro-mining people who will espouse about how they won WWI and WWII. It wasn't any mining region that won either of those wars, it was people like my mother who was a master sergeant in the army during WWII, it was people like my father who was wounded while serving as an airplane mechanic on the Bunker Hill Aircraft Carrier during WWII, it was people like my two uncles who survived the bombing of their ships in Pearl Harbor on December 7, 1941. No mining region won any war. The only war that a Northeastern Minnesota mining region could possibly win is the civil war that they have started over the health and prosperity of the region and the results of that war are yet to be determined. Sulfide mining in Minnesota is a crime against humanity. The sociological/political pollution corruption brought about mining communities as a result of allowing the violation of laws and standards required of others for the benefit and privilege of mining proponents breeds social decadence and disrespect for the law

Dennis Szymialis
P.O. Box 161731
Duluth, MN 55816

Townley, Jill (DNR)

From: Jeanne Taylor <jtdancingwaters@gmail.com>
Sent: Tuesday, September 04, 2012 12:39 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Jeanne Taylor
3637 10th Ave. S
Minneapolis, MN 55407

Townley, Jill (DNR)

From: Rob Thomas <rob.thomas.j@gmail.com>
Sent: Friday, August 31, 2012 8:39 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

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- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Rob Thomas
2740 Nelson Rd
Delano, MN 55328

Townley, Jill (DNR)

From: arlene torbica <arlenetorbica@sbcglobal.net>
Sent: Thursday, August 30, 2012 5:07 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

arlene torbica
1707 N. Prospect Ave.
Milwaukee, WI 53202

Townley, Jill (DNR)

From: Holly Tourdot <hollytourdot@hotmail.com>
Sent: Thursday, August 30, 2012 2:33 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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Sincerely,

Holly Tourdot
E256 Middle Road
La Pointe, WI 54850

Townley, Jill (DNR)

From: Dianne Tuff <upfront@netlinkcom.com>
Sent: Thursday, August 30, 2012 1:39 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Dianne Tuff
9752 380th St.
St. Joseph, MN 56374

Fay, Lisa (DNR)

From: Richard Ulrich <rua1@localnet.com>
Sent: Thursday, August 30, 2012 9:48 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

Please put clean water first, I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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Sincerely,

Richard Ulrich
44974 Tamarack River Rd
Hinckley, MN 55037

Townley, Jill (DNR)

From: Pam Videen <pam.videen@mnhs.org>
Sent: Thursday, August 30, 2012 12:58 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Pam Videen
13828 Flay Avenue N
4305 Parkview Court

Hugo, MN 55127

Townley, Jill (DNR)

From: mary wacha <marywacha@gmail.com>
Sent: Saturday, September 01, 2012 12:26 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

mary wacha
2955 arthur st ne
mpls, MS 55418

Townley, Jill (DNR)

From: Pauline Wahlquist <paulinewahlquist@yahoo.com>
Sent: Thursday, August 30, 2012 1:36 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

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Sincerely,

Pauline Wahlquist
10979 State Hwy 23
Brook Park, MN 55007

Fay, Lisa (DNR)

From: Paula Maccabee <pmaccabee@visi.com>
Sent: Wednesday, September 05, 2012 2:32 PM
To: *Review, Environmental (DNR)
Cc: Landwehr, Tom (DNR)
Subject: Minntac Mine "Extension" Comment Requesting EIS - confirmation requested
Attachments: WaterLegacyMinntacCmt(9-5-12).pdf

Lisa Fay, Planner Principal
Minnesota Department of Natural Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4032

Dear Ms. Fay:

Attached with this email, please find comments prepared by WaterLegacy responding to the Mine Extension Environmental Assessment Worksheet ("MDNR Extension EAW") noticed for public comment on August 6, 2012,

WaterLegacy requests that the MDNR prepare an environmental impact statement ("EIS") for the Minntac Mine "Extension" due to the potential for significant environmental effects resulting from the project and its cumulative impacts when considered with other Minntac mining activities and recent expansions.

Please confirm by phone or email your timely receipt of our comments. Please also feel free to contact me if you have any questions or would request electronic copies of any of the documents cited in our letter.

Sincerely yours,

Paula Maccabee, Esq.
JUST CHANGE LAW OFFICES
1961 Selby Ave.
St. Paul MN 55104
phone: 651-646-8890
fax: 651-646-5754
Cell: 651-775-7128
e-mail: pmaccabee@justchangelaw.com
<http://www.justchangelaw.com>

Counsel/Advocacy Director for Water Legacy

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Paula Goodman Maccabee, Esq.

Just Change Law Offices

1961 Selby Ave., St. Paul, Minnesota 55104, pmaccabee@justchangelaw.com
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<http://justchangelaw.com>

September 5, 2012

Lisa Fay, Planner Principal (environmentalrev.dnr@state.mn.us)
Minnesota Department of Natural Resources
500 Lafayette Road, Box 25
St. Paul, MN 55155-4032

RE: U.S. Steel Corp. Minntac Taconite Mine West Pit "Extension"
Comment Requesting Preparation of Environmental Impact Statement

Dear Ms. Fay:

These comments are submitted on behalf of WaterLegacy, a Minnesota non-profit organization formed in 2009 to protect Minnesota water resources and the communities that rely on them. WaterLegacy has more than 3,000 members throughout the State of Minnesota, including members who reside, hunt, canoe, fish, and gather wild rice in areas affected by the proposed project and by the cumulative impacts of U.S. Steel Corporation's Minntac mine and tailings basin.

Pursuant to Minnesota Statutes 116D.04 and Minnesota Rules Chapter 4410 and based on documents cited below, including the Minnesota Department of Natural Resources Minntac Mine Extension Environmental Assessment Worksheet ("MDNR Extension EAW") noticed for public comment on August 6, 2012, WaterLegacy requests that the MDNR prepare an environmental impact statement ("EIS") for the Minntac Mine "Extension."

An EIS is required since the Minntac Mine "Extension" has the potential for significant environmental effects on streams, wetlands, water quantity, water quality, public health and habitats and due to the significant cumulative impacts of the project and Minntac mining activities on these resources. In addition, the EAW has neither provided specific targeted mitigation measures to eliminate the risk of potential environmental harm nor alternatives to the proposed project that would be evaluated in an EIS.

For decades, Minntac's phased expansion and destruction, pollution and appropriation of water resources has evaded detailed environmental review. The permit process has neither protected Lake Superior Basin and Rainy River Basin water resources, allowed a comprehensive examination of the effects of Minntac's facilities, nor required selection of alternatives to minimize and mitigate those effects. An EIS is needed to address the cumulative potential effect of the Minntac Mine "Extension" and minimize the environmental effects contributed by the project.

Environmental Effects of the Proposed Minntac Mine Extension

U.S. Steel's proposed Minntac Mine "Extension" would have the following scope and effects:

- Conversion of 483.2 acres of land to open-pit mining, including 369.1 acres of vegetated land. (MDNR Extension EAW, p. 11)
- Movement of nearly 2 billion tons of material from this 483-acre extension, including 1,009,568,000 long tons of ore, 836,716,000 long tons of waste rock and 134,059,000 long tons of surface overburden. (*Id.*, p. 28)
- Extension of mine life and taconite production to 2031, resulting in increasing duration of impacts to water quality and quantity. (MDNR Extension EAW, p. 3)
- Removal of approximately 4,002 linear feet of streams and impacts to 470 acres of watershed contributing area. (*Id.*, p. 43)
- Direct loss of 66.7 acres of wetlands and indirect loss of an additional 5.4 acres of wetlands from alteration of hydrology. (*Id.*, p. 46)¹
- Increasing mine dewatering by 5 percent, potentially effecting up to 57 municipal or private wells within a half-mile of the West Pit, East Pit or roadway relocation. (*Id.*, p. 25)
- Continued appropriation of 8,798 million gallons per year from the West Two River Reservoir and the Mountain Iron Pit for another 19 years. (*Id.*, p. 24)
- Increasing waste rock stockpiles by up to 170 feet to accommodate waste materials. (*Id.*, p. 4)
- Addition of approximately 550,000,000 cubic yards of tailings to the Minntac tailings basin. (*Id.*, p. 4)

Cumulative impacts of the Minntac "Extension" and existing and past mining activities at Minntac include the following:

- In addition to the 4,002 linear feet of stream that would be removed through the proposed Minntac "Extension," approximately 45,123 linear feet of stream (8.5 miles of stream) has already been removed due to past mining activity. (*Id.*, p. 43).

¹ U. S. Steel received a permit (2007-01868-TWP) from the U.S. Army Corps of Engineers (Army Corps) on April 20, 2009 that includes 5.1 acres of wetlands located within the Extension area, so the area of direct wetland impact requiring Army Corps permit approval for the "Extension" is 60.7 acres. (MDNR Extension EAW, p. 17)

- In addition to the 470 acres of watershed contributing area that would be impacted by the Minntac Mine “Extension” approximately 10,052 acres of watershed have already been impacted or will be, due to past or current mining activities. (*Id.*, p. 43)
- In addition to approximately 72 acres of wetlands that would be lost through the Minntac Mine “Extension,” cumulative wetlands impacts include 251 acres from Minntac’s 1996 mine expansion and 21 acres permitted in 2009 (U.S. Steel Corp, Minnesota Ore Operations Minntac Mine Western Progression Environmental Assessment, USACE, July 2011, “Minntac Pit Progression EA”² p. 1), along with another 76 acres proposed in Minntac’s 2011 “Western Pit Progression,” (USACE Public Notice of Application for Permit, MVP-2010-04976-JCC, “USACE Pit Progression Notice,” April 5, 2011, p. 1)
- In addition to the 483 acres that would be converted to open-pit mining in the Minntac Mine “Extension,” approximately 20,000 acres of land use has been permanently converted to mining through past Minntac activities. (Minntac Pit Progression EA, p. 14). This is an area of 31.25 square miles.

Minnesota Statutes and Rules Require Preparation of an EIS and Consideration of Alternatives where there is Potential for Significant Environmental Effects

Preparation of EIS is required under the Minnesota Environmental Policy Act (“MEPA”). “Where there is potential for significant environmental effects resulting from any major governmental action the action shall be preceded by a detailed environmental impact statement prepared by the responsible governmental unit.” Minn. Stat. 116D.04, Subd. 2a. An EIS provides an independent analysis of environmental impacts and also “discusses appropriate alternatives to the proposed action and their impacts, and explores methods by which adverse environmental impacts of an action could be mitigated.” *Id.*

Minnesota Rules mandate that an EIS be prepared when a responsible governmental unit (RGU) “determines that, based on the EAW and any comments or additional information received during the EAW comment period, the proposed project has the potential for significant environmental effects.” Minn. R. 4410.2000, Subp. 3. “Multiple projects and multiple stages of a single project that are connected actions or phased actions must be considered in total when determining the need for an EIS and in preparing the EIS.” Minn. R. 4410.2000, Subp. 4.

The RGU must consider cumulative potential effects in deciding whether a project has the potential for significant environmental effects:

The RGU shall consider the following factors: whether the cumulative potential effect is significant; whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to

² Although the West Pit Progression EA is titled as if it were a U.S. Army Corps of Engineers (“USACE”) document, Jill Bathke, staff to the USACE, confirmed in a September 5, 2012 phone conversation that this document was prepared by consultants for U.S. Steel Corp., not by the USACE.

which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect; and the efforts of the proposer to minimize the contributions from the project. Minn. R. 4410.1700, Subp. 7.

In addition, "Connected actions and phased actions shall be considered a single project for purposes of the determination of need for an EIS." Minn. R. 4410.1700, Subp. 9.

The Minnesota Supreme Court reversed a negative determination on the need for an EIS in *Citizens Advocating Responsible Development, et al., vs. Kandiyohi County Board of Commissioners*, 713 N.W.2d 817 (Minn. 2006) ruling that the purpose of the "cumulative potential effects" criterion is to put the proposed project into context with other impacts in the geographic area:

The criteria aims to determine whether the project, which may not individually have the potential to cause significant environmental effects, could have a significant effect when other local projects already in existence or planned for the future are considered. *Id.* at 829.

In the *CARD v. Kandiyohi* case, the Court also explained that an RGU may not rest its EIS determination decision on mitigation that amounts to only "vague statements of good intentions." *Id.* at 834. "When an RGU considers mitigation measures as offsetting the potential for significant environmental effects under *Minn. R. 4410.1700*, it may reasonably do so only if those measures are specific, targeted, and are certain to be able to mitigate the environmental effects." *Id.* at 835.

An EIS serves a very different function from an EAW. Unlike an EAW, an EIS must consider alternatives that minimize and mitigate environmental impacts of a proposed project and compare the impacts of the proposal to other reasonable alternatives. Environmental Quality Board Rules state:

Alternatives: the EIS shall compare the potentially significant impacts of the proposal with those of other reasonable alternatives to the proposed project. The EIS must address one or more alternatives of each of the following types of alternatives or provide a concise explanation of why no alternative of a particular type is included in the EIS: alternative sites, alternative technologies, modified designs or layouts, modified scale or magnitude, and alternatives incorporating reasonable mitigation measures identified through comments received during the comment periods for EIS scoping or for the draft EIS. . .The alternative of no action shall be addressed. Minn. R. 4410.2300, Subpart G

Under applicable law, the Minntac Mine "Extension" and the cumulative contributions of Minntac mining activities have the potential to result in significant environmental effects requiring an EIS.

The Mine "Extension" and Cumulative Minntac Mining Activities have the Potential to Result in Significant Environmental Effects on Streams and Watersheds

The MDNR EAW details the potential significant environmental effects of the Minntac Mine "Extension" on streams and watersheds. The Minntac expansion project would impact Kinney Creek, tributaries of West Two River, and Parkville Creek - a tributary to the West Two River Reservoir in the St. Louis River Watershed of the Lake Superior Basin. (MDNR Extension EAW, p. 12). The project would eliminate 4002 linear feet of streams. (*Id.*, p. 43)

Both Kinney Creek and West Two Rivers are designated trout streams pursuant to Minnesota Rules. Minn. R. 6264.0050, Subp. 4 (Y)(37) and Subp. 4 (PP)(82)(2012); Minn. R. 7050.0470, Subp. 1A (116) and Subp. 2A (62) (2012).³ Although the EAW does not discuss the trout stream designation, the MDNR does note that tributaries to Kinney Lake and the West Two River Reservoir "may support seasonal fish populations" and that Parkville Creek is a "major tributary." (MDNR Extension EAW, p. 12).

The EAW details the potential for significant environmental impacts on fish resulting from stream and watershed impacts:

Tributary streams and adjacent flooded wetlands are critical spawning habitat for northern pike in the spring. Groundwater level changes, loss of wetlands, loss of headwater stream portions, and alteration of sediment transport contribute to hydrological and habitat change in tributaries such as the West Two Rivers and Parkville Creek. Decreased flow in the spring in particular can negatively impact northern pike spawning success. Changes in sediment transport, from either increased or decreased flow, can alter the geomorphology and stream habitat. Increased sedimentation usually results in a decrease in quality fish habitat. . .

Fisheries data from these stations indicate that the small streams within the mine extension area could contain brook stickleback, central mud minnow, creek chub, mottled sculpin, fathead minnows, golden shiner, Iowa darter, northern redbelly dace, tadpole madtom, white sucker, and yellow perch. The larger systems of the East and West Two Rivers had similar assemblages, but also included sunfish, northern pike, black bullhead, black crappie, and shorthead redhorse. . .

Loss of habitat in the tributaries can impact the resident fish but also can negatively impact downstream fisheries. Northern pike and white sucker populations may be impacted as they likely move between the West Two Rivers Reservoir and the tributaries, particularly for spawning. Fish movement, i.e. immigration into the reservoir, is prevented by the reservoir dam so the upstream habitat is especially important for maintaining the population of these two species and others. . .

Stream habitat impacts will occur due to excavation of the extension area for mining activities. . . In addition to the direct loss of stream habitat, impacts to downstream

³ Although the MDNR 1996 Record of Decision rejecting the Need for an Environmental Impact Statement for U.S. Steel - Minntac's Proposed Mine Extension Project, Trout Stream Diversion (June 10, 1996) states that the MDNR removed Kinney Creek from the designated Trout Stream list in December 1995, this "delisting" is not reflected in Rule. Removing this designated use could violate state and federal non-degradation laws.

water bodies (including downstream public waters) will also occur as the natural hydrology of the area is changed.

While mine pit dewatering discharge will replace some of the natural flow that is lost, downstream water bodies may also be impacted by the “cone of depression” that results from pumping, particularly groundwater-fed streams and water bodies. All of these changes could impact fisheries in the streams to be removed as well as in downstream waters. (MDNR Extension EAW, p. 12)

The EAW further explains “Contributing watershed areas can be severed or completely removed due to mining activity, directly affecting runoff from precipitation and resultant streamflow.” Although mine pit dewatering discharge will replace some of the natural flow that is lost, “dewatering flows do not mimic the natural hydrologic processes, chemically or physically (including high flows and low flows), that occurred prior to mining.” (*Id.*, p. 19)

The EAW details the cumulative impact of extension and past Minntac mining on specific streams and tributaries: 1) nearly 100 percent destruction of Parkville Creek (100 percent of stream contributing area, 100 percent of stream segment channel length - 29,813 feet, and 99.7 percent of the total streamflow); 2) complete 100 percent destruction of McQuade Creek, a Kinney Creek Tributary (100 percent of stream contributing area and 100 percent of streamflow); 3) complete 100 percent destruction of Kinross Creek Tributaries (100 percent of stream contributing area, 100 percent of streamflow); and complete 100 percent destruction of West Branch Two River Tributaries (100 percent of stream contributing area for the two remaining tributaries and 100 percent of streamflow for all three tributaries). (*Id.*, pp. 20-21)

The EAW demonstrates the potential for significant and cumulative environmental effects on the health of river systems and downstream fish populations:

Stream habitat loss from past, current and future mining activities has a cumulative effect. The health of a river system is dependent on connectivity and access to diverse habitat is important for game fish populations as well as their prey. The West Two Rivers Reservoir dam is a barrier to fish passage, and since the fish and mussel populations in the reservoir are already disconnected from downstream waters and populations, loss of upstream tributary habitat is important. As indicated in Item 12, approximately 4,002 linear feet of stream would be removed through the proposed Extension Project. Approximately 45,123 linear feet (8.5 miles) of stream has already been removed due to past mining activity.

In addition to the direct loss of stream habitat, cumulative effects to downstream public waters and other water bodies will also occur as the natural hydrology of the area is changed. Contributing watershed areas can be severed or completely removed due to mining activity. The proposed Extension Project will impact 470 acres of watershed contributing area. Approximately 10,052 acres of watershed have already been impacted or will be, due to past or current mining activities. (*Id.*, p. 43, see also pp. 45-46)

Mitigation cannot be used to discount the potential for significant and cumulative environmental effects on streams and watersheds. The EAW demonstrates that there are no specific, targeted and certain mitigation measures for stream impacts of the Minntac Mine "Extension." Instead of a specific plan, the EAW says, "U.S. Steel will work with the DNR, USACE, and MPCA to address stream impacts and mitigation during the wetland permitting process." (*Id.*, pp. 19-20)

The EAW confirms that basic research needed to assess stream function that would be lost through the project and evaluate mitigation measures has not yet been done, "Information gathered during these studies will be used to characterize the stream and evaluate mitigation alternatives that would best replace the stream functions and values lost due to the extension project." (*Id.*, p. 20). Under *CARD v. Kandyohi*, where there are only good intentions but no specific mitigation plan, an EIS must be prepared.

The Mine "Extension" and Cumulative Minntac Mining Activities have the Potential to Result in Significant Environmental Effects on Wetlands

The proposed Minntac Mine "Extension" would result in a direct loss of 66.7 acres of wetlands and indirect loss of an additional 5.4 acres of wetlands from alteration of hydrology. (MDNR Extension EAW, p. 46).

Records were not available to document the total cumulative destruction of wetlands resulting from Minntac mining activities. However, various documents suggest that wetlands loss from Minntac's 1996 expansion, Minntac's projects in 2009, 2010 and 2011, its unpermitted encroachment and the proposed Minntac Mine "Extension" project would be at least 433 acres.

Minntac's consultants reference 251 acres of wetlands impacts permitted at the time of Minntac's 1996 mine expansion and 21 acres permitted in 2009 (Minntac Pit Progression EA, p. 1). U.S. Steel obtained another wetlands destruction permit in June 2010 to fill 8.75 acres of wetlands associated with construction of the SC&R (seep collection and return) system. (Minntac Pit Progression EA, p. 7) and is seeking another 76 acres of wetlands dredge and fill in its 2011 "Western Pit Progression." (USACE Pit Progression Notice, p. 1). In addition to these permitted losses, U.S. Steel apparently filled another 4.82 acres of wetlands without a permit.

These losses have environmental significance. This past year, the U.S. EPA fined U.S. Steel \$161,000 for violation of Section 301 of the Clean Water Act resulting from filling 4.82 acres of wetlands without a permit. The EPA's Notice for the Final Order from this violation underscored the environmental significance of wetlands destruction at the Minntac site, stating, "The alleged violations are of environmental significance because the activities resulted in a loss the biological integrity and biodiversity of the impacted watersheds." (U.S. EPA Public Notice of Intent to file Proposed Consent Agreement and Final Order against U.S. Steel Co. for Violations of Section 301 of the Clean Water Act, Jan. 13, 2012)

The above estimates of wetlands loss primarily reflect direct impacts, rather than indirect

impacts from mine dewatering. Depending on whether wetlands are fed from groundwater or precipitation, “there is the potential that mine pit dewatering could indirectly impact wetlands as the cone of depression from mine dewatering extends further to the south and lowers groundwater levels.” (MDNR Extension EAW, p. 17)

The EAW contains no analysis of wetlands functionality that may be lost to watersheds resulting from wetlands destruction. The MDNR explained that the EAW did not contain information on indirect wetlands impacts, stating “No studies of the indirect wetland impacts from the current mine have been completed.” (*Id.*, p. 17) This gap in analysis is particularly striking since the EAW documents that dewatering from Minntac’s East and West pits is quite significant -- 20.5 million gallons per day. (*Id.*, p. 13)

The proposed compensatory mitigation plan for wetlands loss neither analyzes project impacts on the watershed if wetlands are replaced outside the area nor reflects an approved replacement location. Although U.S. Steel has proposed wetlands replacement at the Palisade Bank in Aitkin County, this site has not yet been approved. (MDNR Extension EAW, p. 19) The Palisade Bank project would construct wetlands in a former corn and soybean operation. (USACE Pit Progression Notice, p. 2) Review of this proposal is in progress and no wetland credits have been released for use to date. (USACE Public Notice of Application for Permit, MVP-2012-00415-JCB, July 3, 2012, “USACE Extension Notice,” p. 3)

In communications with the Army Corps, the U.S. EPA has expressed concern about the lack of detail in the compensatory mitigation plan, stating,

More details on the compensatory mitigation proposed is needed. The mitigation plan must meet the requirements set forth in the 2008 Compensatory Mitigation Rule (33C.F.R. § 332.1-332.7 and 40 C.F.R. 230.91 – 230.97). Currently, it is unclear whether the Palisades III bank will provide the type of wetland replacement needed for this project and there is some concern about obtaining credits outside the Bank Service Area where the impacts occurred. (Email of Kerryann Weaver, U.S. EPA to Jill Bathke, USACE, Request to Review U.S. Steel EIA for Minntac Extension, Aug. 3, 2012, “USEPA Extension Email”).

The environmental effects of direct and indirect wetlands loss on watershed functionality have not been analyzed and the mitigation plan is too speculative to reduce the potential that this loss would result significant environmental effects. An EIS is needed due to the potential for significant environmental effects from direct and indirect wetlands loss from the Minntac Mine “Expansion” and cumulative Minntac mining activities.

The Mine “Extension” and Cumulative Minntac Mining Activities have the Potential to Result in Significant Environmental Effects on Water Quantity

Minntac appropriates 8,798 million gallons of water per year or 27,000 acre feet per year from the Mountain Iron Pit and the West Two Rivers Reservoir for the purpose of process makeup water for the taconite processing facilities. (Minntac Pit Progression EA, p. 9) Permitted appropriation for Minntac facilities is 11,415 million gallons of water per year (*Id.*, Appx. F,

Permit 80-2085) equivalent to 35,000 acre-feet per year.

What is the scale of Minntac's water appropriation? Existing water appropriation would cover a 27,000-acre lake with a foot of water per year, and permitted appropriations would cover a 35,000-acre lake with a foot of water per year. As points of reference, Lake Calhoun in Minneapolis is 401 acres; Birch Lake in St. Louis County is 5628 acres; and Lake Kabetogama, in Voyageurs National Park, Minnesota's 6th largest lake is a 25,000-acre lake. Minntac's existing appropriations reflect a volume of water sufficient to cover 67 Lake Calhouns or more than four Birch Lakes with a foot of water every year.

The Minntac mine is located along the Laurentian Divide, and lies along two major watersheds. The East and West Pits are located within the St. Louis River watershed in the Lake Superior Basin. The Minntac tailings basin is located within the Little Fork River watershed (major watershed number 76), which drains north to the Rainy River Basin. (MDNR Extension EAW, p. 16).

In evaluating Minntac's 2011 expansion, described as the "West Pit Progression," Minntac's consultants acknowledged that water-related impacts of Minntac expansions "have included the transfer of water between watersheds, most notably from the St. Louis River watershed, where the dewatering occurs, to the Rainy River watershed, where the tailings basin is located due to the appropriation of process makeup water." (Minntac Pit Progression EA, p. 31).

Minntac's EA noted that, "The current Water Appropriations Permits for Minntac do not contain maps of the sump and discharge locations." (*Id.*, p. 9) It is thus not possible to determine how much water is appropriated from which watershed, how much water is diverted to another watershed and how much water is consumed by the Minntac facilities.

In its comments on last year's Minntac expansion, the U.S. EPA raised concerns about the transfer of water out of the St. Louis River watershed, stating:

The St. Louis River watershed is part of and contributes to the Lake Superior basin. The 1986 Federal Water Resources Development Act (Amended 2000) requires approval by all Great Lakes governors for any exports or diversions of Great Lakes water out of the basin. The 2005 Great Lakes Water Resources Compact prohibits most new diversions and exports of water out of the Great Lakes basin, including those used for non-public water supplies. (U.S. EPA, Ken Westlake letter to USACE, Jill Bathke re Western Progression, Apr. 5, 2012, "USEPA Western Progression Letter", p. 4)

The Great Lakes St. Lawrence River Basin Water Resources Compact ("Great Lakes Compact") referenced by the U.S. EPA prohibits all new or increased diversion of water from any Great Lakes Basin. Pub. Law 110-342 – Oct. 3, 2008, 122 Stat. 3739, Art. 4, Sec. 4.8. Only limited exceptions apply to allow such appropriations if there is a new or increased withdrawal from the basin of 100,000 gallons per day or greater average over any 90-day period (none of which appear to apply to Minntac). *Id.*, Sec. 4.9 (b). If a proposal results in a new or increased consumptive use of 5 million gallons per day or greater average over any

90-day period, the proposal shall also undergo regional review. *Id.* Sec. 4.9(c).

Minntac's consultants assert that 0.86 million gallons per day of surface seepage enters watersheds of the Rainy River Basin from the west side of the Minntac tailings basin perimeter dike in the Lake Superior Basin. (*Id.*) This assertion is likely to be an understatement of the consumption and diversion of Great Lakes waters.

MDNR has documented that the current average rate of discharge for all dewatering installations in the East and West Mine Pits is 20.5 million gallons per day, with a maximum level as high as 30 million gallons per day. (MDNR Extension EAW, p. 13). MDNR has also estimated that increased area subject to surface water runoff and groundwater inflow from the Minntac Mine "Extension" is likely to increase by approximately 5 percent as a result of the proposed project, with a resulting potential increase in dewatering discharges by up to 5 percent. (*Id.*) Using simple arithmetic, the new or increased dewatering from the project estimated by MDNR would be 1,025,000 gallons per day, more than ten times the threshold where new consumption and diversion are prohibited under the Great Lake Compact.

Although U. S. Steel may want to suggest that its consumption and diversion of Lake Superior Basin waters is "grandfathered" by prior permits and need not be analyzed, protection of Lake Superior Basin through international agreement dates back to at least 1985. The Great Lakes Charter, Principles for the Management of Great Lakes Water Resources ("Great Lakes Charter") was signed by Minnesota, along with other States and Canadian provinces on February 11, 1985. The Great Lakes Charter states "diversions of Basin water resources will not be allowed if individually or cumulatively they would have any significant adverse impacts on lake levels, in-basin uses, and the Great Lakes Ecosystem" and requires prior notice and consultation with all affected States and Provinces if any new or increased diversion from one watershed to another or consumptive use exceeds 5 million gallons per day average in any 30-day period. (Great Lakes Charter, pp. 2-3)

Both the Great Lakes Charter and the Great Lakes Compact address actual use, rather than permitted appropriations. The Charter defines "consumption" and "diversion," respectively as the withdrawal of water not returned to the Great Lakes Basin and the transfer of water to another watershed, not the "permitted" withdrawal or "permitted" transfer. (1985 Great Lakes Charter, pp. 6-7). The Compact states "Impacts can result from individually minor but collectively significant Withdrawals, Diversions and Consumptive Uses taking place over a period of time" (Great Lakes Compact, Sec. 1.2) and requires that cumulative impacts on Great Lakes Basins be evaluated periodically (*Id.*, Sec. 4.15).

It is likely that Minntac's increased consumption and diversion of Great Lakes waters proposed by the "Extension" project would be inconsistent with the Great Lakes Compact.

In addition, both the increased volume of dewatering and the extension in duration of Minntac's massive water appropriation for another 19 years have the potential for significant environmental effects on watersheds. As Minntac's consultants acknowledged in analyzing last year's Minntac expansion:

Dewatering of the mines, which is required for continuing operations, has altered the surface water characteristics of the immediate watersheds. Historically, the watersheds contained numerous small streams which were supported by surface water runoff or discharge from wetlands. Dewatering activities have reduced the watershed areas, which reduces the volume of water available for baseflow. Discharge of the groundwater collected through dewatering has altered historic flow patterns. (Minntac Pit Progression EA, p. 31)

Dewatering from the Minntac Mine "Extension" also has the potential to impact wells, including 57 municipal or private wells within a half-mile of the West Pit, East Pit or roadway relocation for the project. (MDNR Extension EAW, p. 25) The EAW notes that existing wells beyond the mine's buffer zone "may experience some drop in water levels as the cone of depression from mine pit dewatering moves to the south." The EAW then states, "Though not anticipated, if maintaining adequate water levels in the wells becomes problematic, U.S. Steel will work with the well owners on an appropriate course of action to address the issue." (*Id.*)

U.S. Steel's good intentions to work on an appropriate course of action if wells run dry is not sufficient to analyze or mitigate potential impacts on private and municipal wells. The U.S. EPA raised a similar concern with last year's Minntac expansion:

There are a number of wells identified in and south of the western mine expansion. It is possible that some or all of these wells will experience drawdown as a result of mine dewatering, however, the details remain unknown, including potential impacts to private drinking water wells. This issue needs to be further examined and the effects of potential dewatering need to be better defined. (USEPA Western Progression Letter, p. 4)

Potential effects of the Minntac Mine "Expansion" on appropriation and diversion in violation of the Great Lakes Compact and potential significant environmental effects on watersheds and wells is exacerbated since Minntac may yet request additional water appropriations as a result of the proposed project. As explained in the EAW, "Any changes in water appropriations, as a result of the proposed project, would be based on a preliminary mine plan, mine extension, and additional dewatering requirements." (MDNR Extension EAW, p. 25)

An EIS is needed to create a water budget and maps showing the source of Minntac's water withdrawals, the volume of its water consumption, and the location and volume of Minntac's water diversions between various sumps and watersheds and between the Lake Superior and Rainy River Basins. An EIS would permit a thorough analysis of whether Minntac's withdrawal of waters from the Lake Superior Basin is consistent or inconsistent with the Great Lakes Compact.

In addition, an EIS is needed to evaluate potentially significant environmental effects on surface water characteristics of watersheds on both sides of the Laurentian Divide and upon water levels in municipal and private wells resulting from the predicted 5 percent increase in mine and a 19-year extension in the duration of Minntac's appropriation, consumption and diversion of waters.

The Mine “Extension” and Cumulative Minntac Mining Activities have the Potential to Result in Significant Environmental Effects on Water Quality

In determining whether emissions will cause pollution, impairment or destruction of the environment, total facility emissions are considered. *In re Univ. of Minnesota*, 566 N.W. 2d 98, 104 (Minn. Ct. App. 1997). Courts then evaluate whether a facility’s emissions comply with all state and federal standards to determine whether a facility would adversely affect the environment. *Id.* at 105.

Minntac’s wastewater discharge currently violates applicable permits and state water quality standards approved by the U.S. EPA under the Clean Water Act. Among other constituents discharged to receiving waters, the proposed Mine “Expansion” will increase the level of sulfates and hardness, which already exceed permitted levels and applicable standards.

Lacking the customary shield that allows discharge of additional pollution when a facility is in compliance with all permits and standards, any expansion or extension in duration of Minntac’s discharge of sulfates and hardness will allow pollution exceeding permits and water quality standards -- by definition, a significant environmental effect on water quality. Minntac’s Mine “Extension” project requires an EIS due to the potential for significant environmental effects resulting from excessive sulfates and hardness, among other pollutants.

The EAW acknowledges, “sulfate levels in the tailings basin have become problematic for seepage discharged to the environment.” (MDNR Extension EAW, p. 33). In fact, the Minnesota Pollution Control Agency (“MPCA”) has documented Minntac’s violation of state sulfate discharge standards since at least 1987. A February 2000 letter from the MPCA regarding the Minntac Tailings Basin states:

As you know, *NPDES/SDS* permit MN0057207 expired in 1992, although its provisions remain applicable . . . the existing [tailings basin] facility, which is presently violating water quality standards for sulfate, as well as to the proposed new discharge. . . Sulfate has been identified as a pollutant of concern at the tailings basin since at least 1987.” (Letter Douglas Hall, MPCA to David P. Johnson, USX-Minnesota Ore Operations, Feb. 16, 2000)

In reviewing a proposal by Minntac to siphon tailings basin discharge to various locations, the MPCA concluded in 2005 with respect to sulfates and specific conductance, “elevated levels of these constituents have been noted such that violations of state water quality standards have occurred in the surface receiving waters downstream of the tailings basin.” (MPCA Approved EIS for the proposed U.S. Steel – Minntac Water Inventory Reduction Project, Findings and Conclusions, Nov. 30, 2005, “MPCA Water Inventory FEIS,” p. 2)

The Multi-Media Schedule of Compliance signed by US. Steel with the MPCA in 2011 documented years of discharge of sulfates and hardness from the Minntac tailings basin in violation of permits. From 2006 through 2010, the total mass of sulfate exceeded permitted limits each year, with a total exceedance for these four years of 281,355 pounds of excess sulfates. (Schedule of Compliance, Multi-Media Pollutant Reduction U.S. Steel & MPCA,

June 9, 2011, "Multi-Media SOC," p. 8). Similarly, from 2007 through 2010, the total mass of hardness (CaCO₃) added to process wastewater exceeded permitted limits each year, with a total exceedance for these three years of 1,364,893 excess pounds of hardness. (*Id.*, pp. 8-9).

The Minntac Mine "Extension" will result in extension of taconite production and tailings basin use until 2031 (MDNR Extension EAW, p. 3) and in the addition of 550,000,000 cubic yards of tailings to the tailings basin (*Id.*, p. 4). Given a quarter of a century of documented violation of water quality standards at the Minntac tailings basin, it should be presumed that this increase in duration and volume of tailings would result in additional and cumulative pollution from the tailings basin in excess of water quality standards. An EIS is required to analyze and propose alternatives and mitigation for the highly probable if not certain significant environmental effects of this pollution.

In particular, an EIS is needed to evaluate impacts on aquatic systems and wild rice in downstream receiving water from the Minntac tailings basin. The U.S. Army Corps of Engineers, in its Public Notice pertaining to the Minntac "Extension" highlighted this potential impact, stating, "The Sandy River is located adjacent to Minntac's tailings basin. *The Sandy River, and its downstream receiving water, the Pike River, are both designated wild rice waters. The traditional ricing of these waters is well known.*" (USACE Extension Notice, p. 9, emphasis added). The EAW did not discuss any potential impacts on wild rice from additional discharge of tailings and additional duration of sulfate discharge due to the proposed project.

In addition to increasing pollution from the tailings basin, the Minntac Mine "Extension" will result in increased discharge of sulfates and other dissolved contaminants from in-pit disposal and waste rock stockpiles impacting the St. Louis River Watershed. The EAW explains,

Increased in-pit disposal may result in runoff, and therefore mine sump dewatering discharges, with elevated concentrations of certain dissolved constituents (e.g., sulfate, hardness, alkalinity, chloride). This could result in an increase of these constituents in downstream receiving waters. (MDNR Extension EAW, p. 29)

With respect to stockpiles and the new mine pit area, "The extension will expose additional materials in stockpile areas as well as in the new pit area. Future increases in sulfate levels could potentially be associated with the accumulation over time of additional materials and areas exposed to the elements." (*Id.*, p. 45).

This potential increase in sulfate levels is environmentally significant since mine pit area sumps in the St. Louis River Watershed already discharge elevated levels of sulfates. The EAW reports that monitoring data over the last five years show sulfate levels discharging to the Two West River in the St. Louis River Watershed ranging from 371 mg/L to 501 mg/L (SD001) and from 261 mg/L to 358 mg/L (SD004). Sulfate levels in sump SD003 to Kinney Creek in the St. Louis River Watershed have ranged from 126 mg/L to 154 mg/L. (*Id.*)

The potential for significant environmental effects on aquatic life and wild rice from sulfate, hardness, alkalinity and chloride discharge is exacerbated since the Mine "Extension"

proposal does not include a mine stockpiling plan, so locations and stockpile designs are unknown. (*Id.*, pp. 3-4) An EIS is needed both to analyze environmental impacts of tailings basin and mine site pollution and to provide alternatives to prevent, minimize and mitigate that harm.

The Mine "Extension" and Cumulative Minntac Mining Activities have the Potential to Result in Significant Public Health Effects due to Mercury Contamination of Fish

In addition to the potential for significant environmental impacts on wild rice and aquatic life, the Minntac Mine "Extension" has the potential for significant impacts on public health due to increased sulfate levels, increased duration of sulfate discharge over time and increased mercury methylation contaminating fish in downstream receiving waters.

In studying U.S. Steel's proposal to siphon off tailings basin discharge to reduce impacts of chemical constituents, the MPCA had the opportunity to examine the relationship between sulfate and promotion of mercury methylation, the mechanism by which inorganic mercury interacts with bacteria, leading to bioaccumulation of bioavailable toxic mercury in fish tissue. The MPCA concluded:

[R]ecent research has shown that sulfate addition may promote the methylation of mercury. Under anaerobic conditions, sulfate provides one of several components needed for the growth of a certain type of bacteria responsible for methylation of mercury in the environment. Therefore, increased sulfate concentrations associated with the proposed project could result in an increase in methylmercury and fish tissue mercury concentrations in the impacted downstream waters. (MPCA Minntac Water Inventory Reduction Project Draft EIS, September 2004, "MPCA Water Inventory DEIS," p. S-10)

The Minntac Water Inventory DEIS reported research in the Sandy and Pike Rivers supporting the conclusion "that high sulfate concentrations are currently resulting in high methylmercury concentrations downstream of the tailings basin seepage points." The MPCA hypothesized that "increased sulfate concentration associated with the proposed project would result in an increase in the pool of sulfate available to enter the sediments where methylation occurs, leading to an increase in methylmercury concentrations in the impacted downstream waters." (*Id.*, p. 5-35).

U.S. Steel objected to portions of the Minntac Water Inventory DEIS that discussed the relationship between sulfates and mercury methylation. In response to U.S. Steel's challenge, the Final EIS affirmed, "The available information and evidence on the relationship of sulfur and fish mercury levels lead to the reasonable conclusion that increased sulfate mass discharges downstream of the Minntac tailings basin would cause increased fish mercury levels, as discussed in the Mercury and Methylmercury Impact Assessment Technical Memorandum." (MPCA Water Inventory FEIS, p. 25)

The DEIS for this possible siphoning project at Minntac documented the potential for significant environmental impacts on angling and fisheries due to sulfates and mercury

methylation, stating “If increased concentrations of sulfate lead to methylation of mercury and increasing accumulations of mercury in fish tissue, there could be continued impacts to the economic activities related to recreational angling and the commercial fishery.” (MPCA Water Inventory DEIS, p. S-21). In addition, the MPCA explained, “potential increases in the methylation of mercury due to increased sulfate levels may impact other recreational and fisheries activities within the Sandy/Pike River and the Dark River, as well as Pike Bay and Lake Vermilion more generally.” (*Id.*)

Increased mercury methylation from the Minntac Mine “Extension” has the potential to adversely effect public health as well as angling and recreation. Methylmercury is a known neurotoxic affecting the human fetus, infants and children as well as wildlife at the top of the food chain.

Receiving waters downstream of Minntac tailings basin are already impaired for fish consumption due to methylmercury contamination. Such impaired waters include Dark Lake and the Sturgeon River on the Dark River side of the discharge and Little Sandy Lake, the Pike River and Lake Vermilion on the Sandy River side. Receiving waters downstream of the mine site are also impaired for fish consumption due to methylmercury contamination. These impaired waters include West Two Rivers Reservoir and the St. Louis River in the Lake Superior Basin. (MPCA Water Inventory DEIS, p. 5-25).

Minnesota Department of Health (“MDH”) researchers recently looked at blood samples from 1,465 newborn infants in the Lake Superior area of Minnesota, Wisconsin and Michigan from 2008 through 2010. The MDH found that one of every 10 babies born in the Lake Superior region of Minnesota has unsafe levels of toxic mercury in his or her bloodstream. (J. Meyers, “Study: 1 in 10 babies in Lake Superior region are born with high levels of mercury,” Duluth News Tribune, Feb. 3, 2012).

An EIS is required due to the potential for significant environmental and public health effects resulting from increased discharge of sulfates promoting mercury methylation. Adverse impacts on angling and commercial fisheries and adverse impacts on the neurologic development of human fetuses, infants and children must be assessed and minimized.

An Environmental Impact Statement is Needed because Tailings Basin Failure and Leachates have the Potential to Result in Significant Environmental Effects

The EAW reveals additional potential for significant environmental effects that require additional analysis and consideration of alternatives in an EIS process.

First, although mining within the Minntac “Extension” will require future storage capacity for approximately 550,000,000 cubic yards of tailings, Minntac has not demonstrated that “adequate factors of safety will result” when these additional tailings are stored. (MDNR Extension EAW, p. 4). The Minntac tailings basin is currently classified as a class iii or “Low Hazard” Dam. But U.S. Steel and its consultants have not provided borings, soundings, testing and an updated stability analysis to show that dam failure won’t result in loss of tailings containment:

This classification may no longer be appropriate and a hazard class review is needed. As part of that review, Minntac or its consultant will need to demonstrate, through completion of a dam breach analysis on the existing and proposed dams, that a failure of an interior dam will not cause a perimeter dam to be overtopped. (*Id.*)

Second, although the nature of fill materials used to construct the proposed segment of the mine access road that crosses the Wacootah Pit would impact the chemical composition of leachate and the effects on water quality in the Wacootah pit from leaching of chemical constituents, Minntac has not identified the nature of materials that would be used. (*Id.*, p. 5) In commenting on Minntac's 2011 expansion proposal, the U.S. EPA expressed concern that taconite tailings not be used as building materials for roadways, explaining, that "normal roadway wear-and-tear will ultimately erode taconite tailings, leading to leaching and atmospheric entrainment and deposition of mercury and possibly asbestiform fibers, causing acidification of surface waters and potential human health impacts." (USEPA Western Progression Letter, p. 2)

Finally, Minntac has not provided basic information regarding waste rock stockpiles from which impacts on soils and surface water could be determined, avoided and mitigated. The EAW suggests that "Methods for stockpiling, volumes, and stockpile locations" and "discussion of measures to prevent or minimize potential environmental problems associated with the proposed extension and roadway relocations" will be relegated to the Permit to Mine Amendment. (MDNR Extension EAW, p. 34)

An EIS is needed to provide an assessment of the complete Mine "Extension" project, including its effects on dam safety and design, its effects on leachate from road construction fill and its effects on soils and surface waters from stockpile design and location. Each of these aspects of the proposed expansion project have the potential for significant adverse effects on water quality.

An Environmental Impact Statement is Needed to Consider Potential Alternatives to Minimize and Mitigate Potential Harm

An EIS should be prepared for the Minntac Mine "Extension" to ensure that alternatives are considered to avoid, minimize and mitigate environmental and human health effects of the mine expansion.

The only alternatives proposed by U.S. Steel in the U.S. Army Corps of Engineers or the MDNR permit processes are a no-build alternative and the proposed plan for continued southern advancement of taconite mining in both the east and west pits. (USACE Extension Notice, p. 3; MDNR Extension EAW, p. 30).

U.S. EPA, in communicating with Army Corps regarding this project, explains that alternatives should be analyzed whenever a proposed project would adversely impact aquatic resources:

The 404(b)(1) Guidelines (Guidelines) require that the applicant demonstrate there are no practicable alternatives available that would have a less adverse impact on the aquatic environment for non-water dependent activities. The Guidelines presume that less damaging upland alternatives are available for these activities unless demonstrated otherwise by the applicant. The applicant has only provided two alternatives, the no build alternative and the proposed plan. EPA requests more detailed information which justifies the applicant's inability to seek additional avoidance and minimization of impacts to aquatic resources under the proposed plan. (USEPA Extension Email).

To date, the MDNR has accepted without independent review that avoidance of impacts to streams and watersheds "is not feasible because of the location of the ore." (MDNR Extension EAW, p. 30) No independent analysis has been provided to date of the alleged economic consequences of the no-build plan claimed by Minntac, and no assessment has been made of alternatives, designs or technologies that would minimize adverse environmental effects of Minntac's expansion proposal.

An EIS for the Minntac "Extension" would address the requirements of the Clean Water Act Guidelines cited by the U.S. EPA and provide an opportunity to consider alternatives that would avoid and mitigate adverse environmental and health effects of Minntac's proposed mine expansion.

An Environmental Impact Statement is Needed Due to Piecemeal Expansions and the Inadequacy of Permitting to Analyze Alternatives or Address Cumulative Impacts

WaterLegacy could not find any place in any record where overall environmental effects of Minntac's mine and tailings basin were reviewed and alternatives considered to avoid and minimize environmental harm.

According to the EAW prepared by the MDNR, the proposed Mine "Extension" would be the second significant amendment of U.S. Steel's Permit to Mine for the Minntac facility. For the prior significant expansion in 1996 no EIS was prepared. (MDNR Extension EAW, p. 6)

Records from the 1996 expansion indicate that no public comments were received relating to Kinney Creek impacts. In fact, it appears that no comments at all were received from the public, environmental stakeholders or tribes. (MDNR Record of Decision in the Matter of Need for an EIS for U.S. Steel - Minntac's Proposed Mine Extension Project, June 10, 1996, "MDNR 1996 Extension ROD," pp. 1, 3).

In approving the 1996 expansion, the MDNR anticipated that within 20 to 25 years of the expansion, the project area would be completed, reclaimed and revegetated. (MDNR 1996 Extension ROD, p. 3). Minntac's history, instead, reflects continuing expansion, in inexorable phased segments, each of which alone may seem insufficient to require review.

Minntac's environmental assessment prepared last year for the "West Pit Progression" suggests that U.S. Steel's incremental expansions are planned in advance, so each may have its own separate review process:

In 2007, Minntac began planning for an extension to taconite mining beyond the current MNDNR permitted mining limits in the East and West Pits. This extension area is the subject of a separate Environmental Assessment Worksheet (EAW) process with the MNDNR and will be subjected to separate permit review processes by the USACE and other regulatory agencies. (Minntac Pit Progression EA, p. 2).

Since 2007, when planning for this year's Mine "Extension" admittedly began, Minntac obtained a permit in 2009 for 21 acres of wetlands destruction in the East Pit (*Id.*, p. 1) and another permit in 2010 allowing approximately 8.75 acres of wetlands destruction associated with construction of the SC&R (seep collection and return) system. (*Id.*, p. 7). In a separate process, in 2011, Minntac is seeking a permit from the U.S. Army Corps of Engineers for the "West Pit Progression," which proposes 497 acres of expansion and impacts on 5,000 feet of streams and 70 acres of wetlands. (USACE Pit Progression Notice, p. 1)

Like the present Minntac "Extension" proposal, last year's "Progression" proposal suggested no alternatives other than the no-build and U.S. Steel's proposed project. (Minntac Pit Progression EA, pp. 2-3). No determination has yet been made whether a federal EIS will be required for last year's "West Pit Progression" or this year's Minntac Mine "Extension." Up until now, each Minntac expansion and each additional encroachment on streams, wetlands and habitats has been separately reviewed, with no comprehensive analysis of cumulative impacts or analysis of alternatives to mitigate adverse impacts.

In addition to Minntac's segmented environmental review processes, the permitting systems controlling Minntac's impacts on water quantity and water quality are fragmented, precluding a comprehensive review of water resource impacts through a permitting process. U. S. Steel is currently permitted to pump water from the mine area in order to conduct mining operations, facilitate the disposal of tailings, and maintain surface waters under eight separate permits. Minntac has five separate MNDNR water appropriations permits (Permit Nos. 63-0846, 80-2084, 80-2085, 98-2002, and 99-2063) and three National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) permits (Permit Nos. MN0052493, MN0057207 and MNC050504). (Minntac Pit Progression EA, p. 7)

Under these various permits, U. S. Steel is authorized to discharge mine dewatering water to numerous receiving surface water systems: unnamed wetlands and ditches tributary to the east Two River; Parkville Creek; West Branch of East Two Rivers; East Branch of West Two Rivers; two unnamed creeks tributary to the West Two River Reservoir; an unnamed tributary to Kinross Creek; unnamed creeks and wetlands tributary to Kinney Lake; Kinney Creek; Kinney Lake; Forsyth Pit Lake (no longer in existence); Western Drainage Ditch; an unnamed tributary to Kinney Creek; and unnamed wetlands. (Minntac Pit Progression EA, p. 8)

Since Minntac's existing permitted appropriation of water is a staggering 11,415 million gallons per year (Minntac Pit Progression EA, Appx. F), even actual increases in

appropriation of several hundred millions of gallons per year could avoid review in any permitting process.

None of Minntac's permits and none of the Environmental Assessment documents at either the state or federal level contain a water budget, analyzing where waters are appropriated from, consumed, and diverted by Minntac within and across watersheds. In addition, there has never been an overall assessment of the volume of water and mass of chemical constituents released by Minntac through its variety of discharge points in various permits. An EIS is critical to provide this long overdue examination of the significant effects of Minntac's mining facilities on water quantity and quality.

Cumulative impacts of habitat destruction are also certain to be discounted if viewed piecemeal. The EAW for the proposed Minntac Mine "Extension" suggests that removing 227 acres of forested upland would have little impact on wolf habitat. (MDNR Extension EAW, p. 15). The EAW does not analyze cumulative impacts of Minntac's habitat destruction on the wolf, lynx, other large mammals or other wildlife. A hint of the environmental significance of this cumulative change in land use is contained in the EAW from Minntac's 1996 expansion:

The project will greatly modify nearly 1000 acres of wildlife habitat . . . Through die-off and lower reproduction, local wildlife populations will decline until compatibility with the remaining habitat is reached. Smaller mammals, amphibians and reptiles will likely perish as mining advances . . . This development pattern may prevent large mammals such as deer, bear, and wolves from moving north-south through the project area. (MDNR, Minntac Extension Environmental Assessment Worksheet, May 1, 1996).

However, the cumulative impacts of Minntac's conversion of forests and wetlands to mining land use are larger still. As Minntac's consultants noted in summarizing last year's proposed expansion,

Cumulative impacts to habitat include habitat lost to date from previous mining activities as well as future plans to extend the permitted mine limits . . . *Approximately 20,000 acres of land use has been permanently converted through past Minntac mining activities.* (Minntac Pit Progression EA, p. 14, emphasis added).

How significant is the cumulative expansion of the Minntac facilities to encompass 20,000 acres of land? In terms of size, Ely is 2.7 square miles, Hibbing is 4.8 square miles and Duluth contains 68 square miles of land. Minntac's land use conversion is equivalent to more than seven times the size of Ely, more than four times the size of Hibbing or nearly 30 percent of the size of Duluth.

Despite the magnitude of Minntac's overall impacts on water resources and land usage, Minntac has, to date, avoided the scrutiny of an EIS and any legal obligation to provide alternatives to prevent, minimize or mitigate environmental effects of its mining facilities.

A poem by John Ciardi (attached) tells the story of a child who asks for more and more "little" pieces of pie until the pie is all gone. The cook in the poem Little Bits reflects on the cumulative impacts of consumption:

By little-bit and little-bit
You've eaten all there was of it.
I know that little-bit are small.
But a lot of little-bits is all.

Conclusion Requesting EIS for Minntac Mine "Extension"

WaterLegacy requests that an EIS be prepared for the Minntac Mine "Extension" under applicable law because the proposed project and cumulative impacts of Minntac mining activities have the potential for significant adverse environmental effects on streams, wetlands, water quantity in the Lake Superior Basin, watersheds and wells, and water quality as it effects aquatic life, wild rice, fish and public health. Environmental impacts on streams and wetlands cannot be discounted by the good intention to mitigate harm, since the proposed mitigation of environmental effects is neither specific nor certain. Minntac's history of violation of permits and water quality standards demonstrates that additional sulfates and other chemicals released due to the proposed expansion will constitute pollution, impairment and destruction of water resources constituting a significant environmental effect.

WaterLegacy requests that an EIS be prepared to ensure that Minntac's expansion plan and mining facilities receive a comprehensive review and consideration of alternatives. An EIS would allow an overall assessment of Minntac's impacts on water resources and habitats and provide an opportunity to determine the balance of water appropriation, consumption and diversion between watersheds. An EIS would allow comprehensive assessment of pollutants and would ensure consideration of alternative sites, designs and layouts, technologies, scale adjustments, reclamation plans, limits on water use and discharge and other mitigation alternatives to reduce the impacts of the Minntac taconite mine, processing facility and tailings basin on the environment and public health.

WaterLegacy would welcome the opportunity to discuss our comments and would be pleased to provide electronic copies of any cited documents not already in your files. Please do not hesitate to call me at 651-646-8890 if you have any questions.

Sincerely yours,



Paula Goodman Maccabee
Counsel/Advocacy Director for WaterLegacy

Enclosure

LITTLE BITS

“Will you have some pie?”
Said Jane. Said I,
“Well, just a little. Just a bit.”
But I found when I had eaten it
That just *one* little bit wouldn't do.
So I told Jane to make it *two*.

Then was I happy with what I got?
Well, little-bits can't make a lot.
For little-bits are small, you see.
So I told Jane to make it *three*.

Three little-bits are not much more
Than *two*. So I said, “Make it *four*.”

And I ate them up. Then asked for *five*.
Then *six*. Till Jane said, “Sakes alive,
Here are two more and that makes *eight*.
If you don't stop you'll eat the plate!”
“*Eight* little-bits,” I said, are fine.
But would you care to make it *nine*?”

Said Jane, “I'd make it *forty-four*.
But, sad to say, there are no more.
By little-bit and little-bit
You've eaten all there was of it.

I know that little-bit are small.
But a lot of little-bits is all.
And little by little by little, you see,
Gets down to none at all for me!

That's why I hope that when I bake
Another pie, you will just take
One great big fat thick lot of it,
And let me have a little-bit!”

John Ciardi, You Read to Me, I'll Read to You

Townley, Jill (DNR)

From: Anna Waugh <banannas711@hotmail.com>
Sent: Sunday, September 02, 2012 11:02 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Anna Waugh
3340 Oakland Ave
Minneapolis, MN 55407

Townley, Jill (DNR)

From: Verba Weaver <vhiddenbay@comcast.net>
Sent: Thursday, August 30, 2012 2:54 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Verba Weaver
8331 Hidden Bay Trail North
Lake Elmo, MN 55042

Townley, Jill (DNR)

From: Carol Wehrman <cjwehrman@comcast.net>
Sent: Tuesday, September 04, 2012 2:34 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, contributing to mercury contamination of fish and disrupting Lake Superior and Rainy River Basin watersheds. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- Minntac has been violating permits and water quality standards for decades, particularly through discharge of huge volumes of sulfates. With larger waste rock piles and the addition of 550,000,000 cubic yards of tailings, downstream wild rice will be harmed and methylation that contaminates fish with toxic mercury will be increased.
- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will destroy more than 72 acres of wetlands. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate the cumulative destruction of streams and wetlands or ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, potentially affecting municipal and private wells as well as streams. Minntac appropriates 8,789,000,000 gallons of water per year – equivalent to a foot of water per year from a 27,000-acre lake.

The Minntac Expansion has huge potential direct and cumulative environmental effects that require an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, public health, wells, and watersheds.

Sincerely,

Carol Wehrman
5812 Deerwood Lane, N.
Plymouth, MN 55442

Townley, Jill (DNR)

From: Ivan Welander <idwelander@yahoo.com>
Sent: Friday, August 31, 2012 10:38 AM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Ivan Welander
86497 Lenawee Road
Herbster, WI 54844

Townley, Jill (DNR)

From: fran whitman <fmwpeq@up.net>
Sent: Friday, August 31, 2012 8:19 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

fran whitman
13856 ford drive
L'ANSE, MI 49946

Townley, Jill (DNR)

From: Art Wilkinson <aawilkinson@prodigy.net>
Sent: Thursday, August 30, 2012 7:27 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Art Wilkinson
830 S. Winthrop St.
St. Paul, MN 55119

Townley, Jill (DNR)

From: Terry J. Williams <willi222@comcast.net>
Sent: Sunday, September 02, 2012 2:24 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I'm writing to ask that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, damaging and destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 "Western Pit Progression" at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel's piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel's long history of non-compliance, it is reasonable to expect that permits won't prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac's cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Terry J. Williams
4170 Brigadoon Dr.
Shoreview, MN 55126

Townley, Jill (DNR)

From: KAREN WILSON <karenhelpsbuyers@gmail.com>
Sent: Thursday, August 30, 2012 7:28 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

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- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

KAREN WILSON
21741 Cottontail dr.
crosby, MN 56441

Townley, Jill (DNR)

From: Jennifer Zeitler <jenrejoice@gmail.com>
Sent: Thursday, August 30, 2012 6:32 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Jennifer Zeitler
335 Platte Wood Drive Unit 114
Royalton, MN 56373

Townley, Jill (DNR)

From: David Zimney <dzimney@mac.com>
Sent: Thursday, August 30, 2012 1:17 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
- The Minntac Expansion increases mine dewatering discharge by 5 percent, affecting wells and watersheds. Minntac’s cumulative hydrology impacts include appropriating and diverting 8,789,000,000 gallons of water per year from the Lake Superior Basin.

The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

David Zimney
11100 cedar hills blvd #124
7110 Excelsior Way

Townley, Jill (DNR)

From: Mary Zink <addiszink@frontiernet.net>
Sent: Thursday, August 30, 2012 9:33 PM
To: *Review, Environmental (DNR)
Subject: Minntac Extension EAW – Request for EIS

Dear Ms. Fay,

Dear Commissioner Landwehr, Ms. Fay:

I am asking that the Minnesota Department of Natural Resources prepare an Environmental Impact Statement (EIS) for the proposed 483-acre Minntac Expansion.

For decades, Minntac has been expanding piecemeal, destroying streams and wetlands, violating water quality standards, and disrupting Lake Superior Basin hydrology. An EIS is needed to make sure that significant and cumulative harm resulting from this proposed Expansion is minimized and reduced:

- The proposed Minntac Expansion will directly destroy 4,002 feet of streams, impacting two streams listed in Rules as trout streams. Adding together the cumulative impacts of this Expansion and prior Minntac mining activities, 100 percent of stream contributing area and streamflow will be destroyed for several creeks and tributaries.
- The proposed Minntac Expansion will directly destroy more than 66 acres of wetlands and indirectly destroy at least another 5 wetland acres. This is on top of 76 acres of wetlands impacts from a 2011 “Western Pit Progression” at Minntac and a loss of 275 acres of wetlands in a 1996 expansion.
- There are no specific plans to mitigate either the cumulative destruction of streams and wetlands, or to ensure that the function of the St. Louis River Watershed is not harmed by U.S. Steel’s piece-by-piece destruction of the aquatic system
- Minntac has been violating permits and water-quality standards for decades, particularly through discharge of huge volumes of sulfates. With U.S. Steel’s long history of non-compliance, it is reasonable to expect that permits won’t prevent significant environmental harm to aquatic systems and wild rice from the proposed expansion of waste rock piles and the addition of 550,000,000 cubic yards of tailings.
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The Minntac Expansion has huge potential direct and cumulative impacts requiring an EIS. Thank you for holding Minntac accountable to minimize and reduce its harm to streams, wetlands, fish, wild rice, private wells, and watersheds.

Sincerely,

Mary Zink
21670 Oland Ave
Scandia, MN 55073