



**Minnesota Division**  
Izaak Walton League of America  
6601 Auto Club  
Road Bloomington  
MN 55438

May 18, 2023

To: Minnesota Department of Natural Resources

From Minnesota Division, Izaak Walton League of America

RE: Milepost 7 Stream EAW

This comment is provided on behalf of the Minnesota Division of the Izaak Walton League of America.

One of the Izaak Walton League's storied members was the late Grant Merritt, the first commissioner of the Minnesota Pollution Control Agency, from 1971-1975. Merritt spearheaded the campaign against the Reserve Mining Company's disposal of asbestos laden tailings into pristine Lake Superior. Those same tailings still threaten the lake today as they sit a few miles upstream of Silver Bay. If he were still alive, we believe Grant would be, as we are, demanding that the Milepost 7 tailings basin not be permitted to expand without a full Environmental Impact Statement and a dam safety permit.

The Environmental Assessment Worksheet for this project is unacceptable, leaving out as it does, the risk of dam failure and relying on the fifty-year old review conducted during the 1970s. An adequate review requires use of current science and engineering standards, the actual physical conditions on the site today, and consideration of the growing risk posed by climate change and the wetter conditions and increased rain and snow events it is already bringing to this region.

The proposed expansion would greatly increase the amount of tailings in the basin, from the 120 million long tons it contains today to a proposed 750 million long tons. The existing facility is operating without a dam safety permit, although this is required under Minnesota law. Dam failure would have catastrophic effects on the Beaver River, humans and wildlife, aquatic life, and water quality in the Beaver River valley and in Lake Superior.

The existing basin demands rigorous monitoring and management for the foreseeable future to protect the 10% of the earth's fresh surface water found in Lake Superior (which was its original

intent). Why would we add to this risk without requiring a current and full Environmental Impact Statement, requiring the use of the most stable dam construction methods available, and requiring a dam safety permit to operate?

Sincerely,

Julie O'Leary  
President of the W.J. McCabe Chapter

Tim Johnson  
Director at Large  
Minnesota Division of the Izaak Walton League of America