

Tamarack Mining Project EIS Scoping

Talon Nickel (USA) LLC's Response to RGU Comments on Project Proposal

On October 11, 2023, Talon Nickel (USA) LLC, (Talon) submitted a project proposal for its Tamarack Mining Project (Project), a proposed new underground mine containing nickel, copper, and iron. The Minnesota Department of Natural Resources (DNR) is the designated Responsible Government Unit (RGU) under Minn. R. 4410.4400, subp. 8, and is responsible for overseeing the environmental review process including preparation and review of environmental documents.

This is the second round of review for the proposed Project. On June 21, 2023, Talon submitted its Initial Project proposal that DNR deemed incomplete on September 19, 2023, DNR deemed the Project proposal incomplete.

The DNR has determined that Talon's October 11, 2023, Tamarack Mining Project proposal is incomplete.

The following two tables include comments made during both rounds of RGU review. The Round One Comment Responses Table includes the RGU's comment from the initial submittal, Talon's response submitted October 11, 2023, and the RGU's follow up comments. The Round Two New Comments Table includes the DNR's new comments on the second submittal. Talon has been provided the DNR comments and may address the identified deficiencies and resubmit the EAW with the additional information requested. A list of abbreviations and acronyms is provided after the tables.

Round One Comment Responses Table

Comment No.	EAW Section	EAW v1 Starting Line No.	Table	Figure	Graphic	Round 1 Comment and RGU Requested Action 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Requested Action 2/5/2024
1	3	21				Partial information can be provided at this time for Item 3, RGU. For "Contact person," list: MN Department of Natural Resources. For "Address," list: 500 Lafayette Road. For "City, State, ZIP," list: St. Paul, MN 55155. Requested Action: Modify text.	Comment is noted. EAW text was modified.	Resolved. Requested Action: None.
2	5	39	1			Table 1 and Table 2. The project Legal Land Description for T48N, R22W, Section 04 may be incorrect. Recheck location in T48N, R22W, Section 04; is the project actually in the NENE ¼-¼-Section (for PID 05-0-005300) instead of SENE ¼-¼-Section as listed in Table 1? Requested Action: Confirm listing in Table 1; edit document if necessary.	Legal Description is verified as correct.	Resolved. Requested Action: None.
3	5	39	1, 2			Confirm if the following ¼-¼-Sections should be listed in Table 1. Specifically: 05-0-003500 in T48N R22W S03 in NESW and also in NESE; 05-0-004600 in T48N R22W S03 in SENW and SESW, and also in SENE and SESW; 61-0-002600 in T48N R22W S10 in NWSE, and also in NWSW; 61-0-033000 in small segments of: T48N R22W S10 in SESW, and also in SESE; T48N R22W S15 in NENW, NWNW, and NWNE, and also in NENE and NWSW; and also in T48N R22W S16 in NESE and NESW though it appears not all of 61-0-033000 is part of the Project. Requested Action: Confirm listing in Table 1; edit document if necessary.	Table 1 is confirmed to be correct. Some land parcels are part of the Project Area, but also extend beyond the Project Boundary. The Legal Description list (Table 1) only includes Quarter that the Project Area falls within.	Resolved. Requested Action: None.
4	5	100		1		Figure 1. The figure would benefit from inclusion of an inset that shows the project site relative to the State of Minnesota, or at least the north-central part of the state.	Figure 1 has been updated.	Resolved. Requested Action: None.

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						Requested Action: Edit figure to include inset scaled to regional location of project.		
5	5	103		4		Figure 4. The figure would benefit from addition of a few of the larger, basic facility labels so the reader does not have bounce between other figures to determine where drainage may be impacted. Requested Action: Edit figure as noted.	Figure 4 has been updated.	Resolved. Requested Action: None.
6	5	107		8		Figure 8. Geologically-relevant faults and fracture zones should be identified, probably in a second figure as a side-view cross section. Requested Action: Edit figure as noted.	See Response to Comment #415.	Comment unresolved. This should be called a "rock unit map" rather than a geological map. Requested Action: Edit as requested.
7	List of Abbreviations	121				Consider adding units or descriptors measuring noise and vibration to the acronym table. Requested Action: Address comment; modify text if warranted.	The Project reviewed the noise and vibration sections and did not identify descriptors that should be added to the acronym table. The acronym list contains the acronyms used in the EAW. Name mnemonics that would have been used only a couple of times were not used as acronyms.	Resolved. Requested Action: None.
8	List of Abbreviations	121				The list of acronyms needs to add Tribal Historic Preservation Officer (THPO), Minnesota Indian Affairs Commission (MIAC), National Register of Historic Places (NRHP), Traditional Cultural Properties (TCP), National Historic Preservation Act (NHPA), Minnesota Field Archaeology Act (MFAA). Requested Action: Address comment; modify text if warranted.	All acronyms used in the EAW are included in the list of acronyms.	Resolved. Requested Action: None.
9	6.a	166				Item 11a notes at Line 1112 "[t]he TIC hosts nickel-copper-cobalt sulfide mineralization with associated platinum, palladium, and gold." Recognizing the EQB's guidance is to limit the Monitor notice to 50 words or less, if platinum, palladium, and gold are anticipated to be extracted as marketed (bi-)products, acknowledging this may be warranted in the Monitor project summary or elsewhere in the document. Requested Action: Advisory only; future discussion item as part of developing the purpose statement and ensuring an accurate project description. The EQB Monitor notice text should be consistent with the purpose statement.	Comment is noted. Talon will participate in future discussions on this topic.	Resolved. Requested Action: None.
10	6.a	166				RGU notes that including "...for use in electric vehicles and other industries..." in the EQB Monitor notice could be viewed as articulating the project's need (beyond disclosing project purpose). Disclosing project need is typically done for public actions although not prohibited for private actions. Not required for Monitor notice. Requested Action: Advisory only; future discussion item as part of developing the purpose statement and ensuring an accurate project description. The EQB Monitor notice should be consistent with the purpose statement.	Comment is noted. The Project will participate in future discussions on this topic.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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11	6.a	178				<p>The document should consistently reference the out-of-state processing facility as being located in North Dakota. The term "location outside of Minnesota" is used at Lines 170 and 220; these should be changed to North Dakota.</p> <p>Requested Action: Modify text.</p>	<p>Numerous lines in the document have been updated to specify the proposed processing location as being in Mercer County, North Dakota.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
12	6.b	178				<p>For clarity and to inform future permitting, providing some additional detail regarding agreement types, business structure, roles, and similar would be useful to public understanding.</p> <p>Requested Action: Modify text; future discussion item if desired.</p>	<p>The text under the "Project Ownership Status" heading has been revised to include additional detail as follows:</p> <p>Talon Nickel (USA) LLC is the majority-owner and has operational control of the Tamarack Mining Project ("Project") through a joint-venture agreement with Kennecott Exploration Company, which is part of the Rio Tinto Group of Companies ("Rio Tinto").</p> <p>As of September 2023, Talon owns a 51% share of the Project while Rio Tinto owns a 49% share. Talon is currently responsible for funding 100% of project expenditures. Upon completion of certain Project milestones as well as a cash payment of US \$10 million to Rio Tinto, Talon may become the owner of up to 60% of the Project at which time Rio Tinto will be responsible for funding 40% of Project expenses on a pro-rata basis, otherwise its ownership share will be progressively diluted (reduced).</p> <p>At all times, Talon maintains operational control of all project decisions including technical items as well as financial items such as selection of customers for the metal concentrate offtake.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
13	6.b	182				<p>The text to this part of Item 6b provides the operational areas in acres, but the way the information is laid out results in confusing mathematics. When discussing Project acreage, one approach would be to:</p> <ol style="list-style-type: none"> 1. Explain the total project area as being approximately 447.0 acres due to approximately 263.3 acres of surface boundaries, approximately 224.9 acres of underground boundaries, with approximately 41.2 acres of overlap. 2. Describe the approximately 263.3 acres of surface boundaries (which may not add-up with the current descriptions provided; requires checking). 3. Describe the approximately 224.9 acres of underground boundaries. <p>Requested Action: Consider the proposed approach and apply to the description of project elements and acreages. Otherwise edit document to address potential points of confusion.</p>	<p>To enhance clarity and reduce potential confusion, a summary table has been added to this section to clarify and reconcile the total Project Area relative to the Underground Boundary and the various components within the Surface Boundary. The text of the EAW was also modified.</p> <p>See Response to Comment #22.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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14	6.b	182				<p>The proposed EAW text identifies the presence of both existing and new/created impervious surface associated with project development. The RGU notes both EAW Item 11 and the Draft Scoping Decision Document would likely require assessment of potential impacts due to project-related impervious surface creation in the EIS.</p> <p>Requested Action: Advisory only; future discussion item.</p>	Comment is noted.	<p>Resolved.</p> <p>Requested Action: None.</p>
15	6.b	182				<p>DNR has yet to determine the EIS scope regarding non-Minnesota components, including how targeted-mineral concentrates might be addressed. However, full characterization of ore and waste rock will be necessary to support both the EIS analyses and permitting requirements. This could include identifying the average fractions expected for target metals, such as nickel, copper, cobalt, and iron (for example) out of the 800,000 short tons of ore mined out annually.</p> <p>Requested Action: Advisory only; future discussion item.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
16	6.b	182				<p>DNR has yet to determine the EIS scope regarding non-Minnesota components, including potential rail transport. However, assessment of potential rail transport effects within Minnesota could include changes to rail traffic estimates between Aitkin County and the Minnesota border with North Dakota.</p> <p>Requested Action: Advisory only; future discussion item.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
17	6.b	182				<p>DNR has yet to determine the EIS scope regarding non-Minnesota components, including the proposed concentrating facility in North Dakota. However, it is appropriate for Item 6b to acknowledge the actual processing and tailings management site if it is known prior to document release for public review and comment.</p> <p>Requested Action: Provide a sentence detailing the location of the North Dakota facilities; edit document as required.</p>	<p>The processing and tailings management site will be located outside of Minnesota in Mercer County, North Dakota, in the western half of North Dakota. No processing or tailings management will be done in Minnesota. The section has been updated to reflect this.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
18	6.b	182				<p>DNR has yet to determine the EIS scope regarding non-Minnesota components, including any required permits or approvals from any jurisdiction in North Dakota. However, it is likely the Draft Scoping Decision Document will include a provision to summarize any permits and approvals required in North Dakota in a format similar to that in EAW Item 9.</p> <p>Requested Action: Advisory only; future discussion item.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
19	6.b	182				<p>The EAW provides an overview of the mine ventilation system at Lines 477-484. It is likely the Draft Scoping Decision Document would require estimates of how much air the ventilation system move, the types of contaminants that may be captured, including method(s) of capture (e.g., filtration). This is partially addressed in EAW Item 17a at Lines 2023-2027.</p> <p>Requested Action: Advisory only; future discussion item.</p>	<p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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20	6.b	182				<p>The document provides little discussion of the water treatment plant itself but does identify it plays a key role in water management. Some information is provided at Lines 658-663, including identification of the preferred reverse-osmosis treatment technology. It is likely the Draft Scoping Decision Document would identify the need for a detailed water treatment plan for reference in the EIS assessment of potential impacts to water resources. Specific to the development of the scoping EAW, Item 6b would benefit from developing a paragraph that consolidates the description of the water treatment plant components, preferred treatment method, and other relevant information (likely already present but dispersed in the greater text).</p> <p>Requested Action: Consider the proposed approach and apply to Item 6b. Modify text as appropriate.</p>	<p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
21	6.b	182				<p>The project description would benefit from a mining process flowsheet that captures all activities associated with rock movement from underground to the surface. This would not replace the existing graphics (e.g., 9, 10, 11) but would provide a simplified presentation of how mining would occur.</p> <p>Requested Action: Consider how to depict mining process and add graphic to document.</p>	<p>Graphic 9 displays the steps involved in the mining process occurring underground, while Graphic 12 displays the flows and steps of materials movement throughout the site.</p> <p>Proposer requests clarification and examples regarding what information is requested to be included on this new simplified graphic.</p>	<p>Comment 21 has not been adequately addressed. Consider linking Graphics 9, 10, and 11, indicate how or where in the process the three are tied together.</p> <p>Requested Action: Modify text to address comment.</p>
22	6.b	182				<p>Currently, the discussion regarding the surface boundary condition is discontinuous, which adds to the confusion. There is a discussion about the approximately 79.1 acres of new development, but no discussion regarding the approximately 3.9 acres of existing development. However, this is only approximately 83.0 acres. What about the remaining approximately 180.3 acres?</p> <p>Requested Action: Address comment; modify text if warranted.</p>	<p>The document text beginning at this line has been modified as follows to clarify the acreage of new vs existing developed surfaces. A description of the remaining 180.3 acres is provided in this section and has been moved to directly follow this paragraph (instead of being located after Graphic 2) to make the text regarding boundary acreages in this section contiguous.</p> <p>"The total acreage of new plus existing developed surfaces utilized as part of the Project would amount to 83.0 acres.</p> <p>The total additional surfaces developed for the Project would amount to approximately 79.1 acres (77.6 acres developed/impervious surfaces and 1.5 acres industrial stormwater pond) after construction is complete. This encompasses the buildings, stockpiles, parking areas, and various other facilities for production operations including the railway spur to connect to the existing BNSF railway line.</p> <p>Approximately 3.9 acres within the Project Area already consists of developed surfaces (encompassing existing residential and agricultural buildings, parking areas, etc.); these features would be replaced with Project-related developed surfaces such as those mentioned above."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
23	6.b	187				<p>The text here is partially duplicative of information provided in lines 203-206. To reduce duplication, eliminate the first sentence and add the second sentence to the paragraph at</p>	<p>Comment is noted.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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						Lines 183-186. Requested Action: Consider comment; edit text.		
24	6.b	187				It is unclear what "total additional developed surfaces" is referring too? Is this based on the current developed surface status or is it beyond the 224.9 acres listed on line 194? Requested Action: Respond to question; clarify text as warranted.	Comment is noted. See Responses to Comments 13 and 22.	Resolved. Requested Action: None.
25	6.b	196		1, 2	1	The surface facilities outlines in Graphic 1 do not appear to be consistent with the "surface boundary" in Figures 1 or 2. Confirm consistency. Requested Action: Consider comment; edit figure as warranted.	Graphic 1 was modified to align better with Figures 1 and 2. As stated in the EAW "an offset distance of at approximately 200 feet has been applied between the extent of the developed surface and the project boundary (with variability as appropriate to align with public roadways, certainty property boundaries, and other project features)."	Resolved. Requested Action: None.
26	6.b	196		2	1	It is not clear how the outline of the areas represented on Graphic 1 is correspond to the outline on Figure 2. Confirm consistency. Requested Action: Consider comment; edit figure as warranted.	See Response to Comment #25.	Resolved. Requested Action: None.
27	6.b	196			1	Graphic 1 needs a legend to distinguish above-ground and underground components/areas. Also, should reorient the map, with the north at the top of the page as with the other figures Requested Action: Consider comment; edit figure as warranted.	Graphic updated as requested. The dark blue polygons show the surface projection of the underground mine workings as they relate to the surface facilities.	Resolved. Requested Action: None.
28	6.b	200		1		The project full area (Black outline in Figure 1) is not mentioned within the document. The processing area is stated as 447 acres, but the full site area is closer to 600 acres (from google earth estimations). This would be valuable information to include. Requested Action: Consider comment; edit figure as warranted.	The Project outline on Figure 1, labeled "Project Area" is defined in the EAW as "The project area is defined by the surface boundary and the underground boundary areas, as shown on Figure 2, and together comprise 447.0 acres."	Resolved. Requested Action: None.
29	6.b	200		3	2	The identified 'facility elements' within the EIS Scoping Document do not match the names used on Figure 3. For clarity the same names/identifiers should be used throughout the document and match what is used within the Figures. Example: Cemented Backfill Plant vs Backfill Materials Crusher Building?; Enclosed Ore Storage and Railcar Loadout Building = Ore Receiving Building?; Stormwater Wet Sediment Basin = Storm Water Pond?; Glacial Till is not identified on Figure 3 but it is called out in line 233. Requested Action: Consider comment; edit figure and/or text as warranted.	The Project has standardized terminology across graphics, figures, F37tables, and texts.	Resolved. Requested Action: None.

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30	6.b	202				<p>Note to Editor: May need to consider some separation in document of any discussion for underground acreage (surface expression) versus actual surface development acreage. Potential for confusion with reviewers.</p> <p>Requested Action: Advisory only.</p>	Comment is noted.	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
31	6.b	203				<p>Should include the number of structures and facilities and their anticipated size and height. This information may be needed to assess visual impacts to natural features and cultural landscape(s)/traditional cultural properties.</p> <p>Requested Action: Consider comment; add detail if available. If not available, then the issue flagged for the Draft Scoping Decision Document.</p>	Future discussion item, as necessary, in development of DSDD.	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
32	6.b	204			2	<p>It is unclear which of the facilities shown in Graphic 2 already exist on the surface. Clarify if the 3.9 acres of existing developed surface has infrastructure already built upon it, and if so, identify what the structures are and what they are being used for.</p> <p>Requested Action: Consider comment; edit document as needed.</p>	<p>Comment is noted.</p> <p>None of the facilities shown in graphic 2 exist at this time. As stated in the EAW "Construction would begin by first removing existing buildings, septic systems and/or leach fields, and other structures (e.g., water and electrical services) that would not be re-purposed as part of the mine facility."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
33	6.b	207				<p>Should provide approximate acreage</p> <p>Requested Action: Consider comment; edit document as needed.</p>	<p>The following text has been added to the Project Description in the referenced section.</p> <p>"The two Construction Staging Areas (temporary) are shown on Figure 3. Together, these areas have approximately 21 acres of uplands within the project boundary that is suitable for use as temporary equipment staging without disrupting other construction activities. This acreage has some overlap with the developed surfaces described above and temporary access surfaces described below. It is expected that not all of this area would ultimately be utilized for temporary staging of construction equipment and supplies."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
34	6.b	212				<p>Typo: "For these activities, an offset distance of at approximately 200 feet has been applied ..."</p> <p>Requested Action: Make edit.</p>	<p>Comment is noted.</p> <p>The EAW is edited.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
35	6.b	216				<p>The full list of metals that will be extracted from ore needs to be stated. If more than one concentrate will be produced the types of concentrate also need to be stated.</p> <p>Requested Action: Consider comment; edit document as needed.</p>	<p>The metals expected to be economically extracted from the ore include copper, nickel, and an iron byproduct. The ore will be shipped to the out-of-state processing facility located in Mercer County, North Dakota where the concentrate products produced will be a copper concentrate and a nickel concentrate (which also contains iron).</p> <p>The nickel and copper concentrates will also contain minor concentrations of additional metals, including gold, cobalt, platinum, and palladium. At this time, it has not been determined whether economic value would be able</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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							to be derived from the presence of these metals in the concentrate.	
36	6.b	217				The extraction timeline should be better defined. Is the 7-10 year period expected to be contiguous or potentially 7-10 years staggered over a larger time period (e.g. based on market demand)? Requested Action: Answer question; modify text if warranted.	The Project expects the operation to be continuous, though the exact duration of mine life would be 7- to 10- years, depending on results of ongoing studies such as rate of production ramp-up and estimated production costs.	Resolved. Requested Action: None.
37	6.b	217				Provide greater details on the duration of the entire mine life, including a description of mine life phases and in what year each phase is anticipated to begin. The Project Description only states the length of the operations period, but not closure or post-closure. Some reclamation activities are mentioned in later sections of the EAW. How would water, stockpiles, and discharge be managed in closure and during periods of care and maintenance? This information is being requested for inclusion in the next data submittal. Requested Action: Consider comment; edit document as needed.	Talon Metals has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to meet the requirements of the EIS scope.	Follow Up - A description of mine life phases at a high level is important to the overall project understanding. Identifying potential significant environmental issues requires knowledge of mine phase duration in the EAW. Please include an outline and timeline of the different phases of mine life in the next revision (line 284). Requested Action: Modify text to address comment.
38	6	218				What are the North Dakota project components? What metal concentrate products are planned to be produced? Requested Action: Answer questions.	Activities at the out-of-state processing facility located in Mercer County, North Dakota will include crushing, grinding, flotation for metals recovery, tailings storage, and concentrate preparation/handling. There will also be rail facilities for receiving inbound shipments of ore and sending outbound shipment of concentrate products. The concentrate products will be a copper concentrate and a nickel concentrate. The iron byproduct is contained within the nickel concentrate.	Resolved. Requested Action: None.
39	6.b	222				Include the Temporary Modular Water Treatment plant as a facility element Requested Action: Consider comment; edit document as needed.	Comment is noted. The facility elements listed in the Project Overview and shown in Figure 3 are the structures necessary for the long-term operation of the mine, not the temporary facilities used during the construction phase.	Follow up – The proposer is encouraged to provide site layout figures of the different phases of construction, including the temporary modular water treatment plant. Requested Action: Modify text to address comment.
40	6.b	227				Bullet 3, Line 4: '... an offset distance of at approximately...' should read '... an offset distance of approximately...' Requested Action: Consider comment; edit document as needed.	See Response to Comment #34.	Resolved. Requested Action: None.

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41	6.b	229				<p>There appear to be multiple separate treatment plants needed for the site: contact water, non-potable water, potable water, & sanitary treatment (in addition to ISW treatment). These may each generate their own waste streams (RO reject, filter backwash solids, sludge, etc..). information on these systems will need to be substantially expanded for the EIS.</p> <p>Requested Action: Advisory only. Level of detail to be determined for the Draft Scoping Decision Document.</p>	Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
42	6.b	238				<p>More detail relative to railcar handling and localized environmental impacts is needed in the EIS.</p> <p>Requested Action: Advisory only. Level of detail to be determined for the Draft Scoping Decision Document.</p>	Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
43	6.b	238				<p>Provide additional detail and description in text and in graphic or figures of the ore storage and rail loadout facility to evaluate potential for impact and level of review in the EIS.</p> <p>Requested Action: Consider comment; edit document, add graphic or figure, as needed. Final level of detail to be determined for the Draft Scoping Decision Document.</p>	The Project will address this question, as necessary, in the EIS. In the meantime, Figure 3 in the EAW includes a graphic representation of the buildings, page 19 provides some description of operations in the buildings, Table 3 indicates approximate square footage of the buildings.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
44	6.b	244				<p>At Line 217 the document indicates a 7-10 year production rate while here it indicates 10 years. To reduce confusion these estimates should be reconciled. More broadly, addressing the timing of construction, operations, and reclamation and closure would benefit from being consolidated into a section at the end of Item 6b. It appears that no estimate is provided for reclamation and closure.</p> <p>Requested Action: Consider comment; edit document.</p>	<p>Mine life duration statements have been standardized to read "7- to 10- years."</p> <p>The precise duration of mine life between 7- to 10-years would be dependent on results of ongoing studies such as rate of production ramp-up and estimated production costs.</p>	Resolved. Requested Action: None.
45	6.b	245				<p>Little detail provided for timing and duration of construction. Construction slated to begin 2026. To the degree that information is available, describe activities seasonally, especially related to peatland disturbance. The draft scoping decision will likely require detailed information on construction sequencing for the impact assessment(s).</p> <p>Requested Action: Consider comment; edit document.</p>	See Response to Comment #46	Follow up. Will season be considered in project activity timelines? Especially as peatlands can be more or less sensitive to impacts depending on season? Requested Action: Answer question; modify text as warranted.
46	6.b	245				<p>Provide estimated years/months for construction.</p> <p>Requested Action: Consider comment; edit document.</p>	Please reference lines 245-248 of the original Project Description submission for brief description of proposed project timeline. Currently, no further information is available regarding construction schedule, duration, or seasonality.	It is understood that uncertainty could be present around the construction schedule at this stage. RGU notes the FSD will require a construction schedule that allows for comparison of potential project effects across various project elements. Temporal sequencing of project elements is needed to understand potential overlapping impacts for potential significance. The eventual Project Description needed for the EIS Preparation Phase should provide this information. Requested Action: Advisory only.

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47	6.b	249				<p>Regarding site preparation, little detail is provided on historical land use or existing conditions to put demolition and construction requirements into context. Clearly there are existing infrastructure, buildings, and utilities.</p> <p>Requested Action: Consider comment; edit document.</p>	<p>Section 10 of the EAW covers land use at the site. "There are a handful of structures within the Project Area, including farmsteads and infrastructure associated with Talon's current exploratory drilling program. Existing land use around and within the Project Area consists of industrial development (environmental studies, geophysical surveys, and exploratory drilling), farmsteads and associated pastures/hay fields, areas of upland forest, timber harvesting tree plantations, and large wetland complexes. Some of the land in the area was ditched and drained several decades ago for agricultural purposes."</p> <p>The Project also deleted the repeated sentence in section 10 "There are a handful of structures within the Project Area, including farmsteads and infrastructure There are a handful of structures within the Project Area, including farmsteads and infrastructure associated"</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
48	6.b	249				<p>Confirm if there is a need for any blasting at or near the surface. If so, include in construction plans.</p> <p>Requested Action: Consider comment; edit document.</p>	<p>See Response to Comment #109 regarding underground development blasting. There is currently no identified need for any surface or near-surface blasting relating to surface facilities construction.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
49	6.b	256				<p>RGU notes that the wastewater generated by the tunneling of the loop access tunnel will need to be quantified/qualified and the mobile/modular treatment plant will need to be specified to address all water quality needs if this water is to be discharged.</p> <p>Requested Action: Advisory only; treatment of topic to be captured in Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
50	6.b	259				<p>Additional detail necessary to describe railway spur construction plans for reviewers to assess the potential types of impacts, along with potential extent and reversibility, on the peatland that the spur would disturb.</p> <p>Requested Action: Consider comment; edit text with additional detail for clarity, including new construction figures.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
51	6.b	259				<p>Provide additional information regarding construction of the railway through the wetlands. Wetland impacts (i.e., permanent, temporary, or indirect), including hydrologic impacts, should be evaluated. Any construction dewatering should be described and a plan for monitoring for ground and surface water impacts during construction should be developed.</p> <p>Requested Action: Consider comment; edit text with additional detail for clarity, including new construction figures.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>

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52	6.b	259				<p>Using a permeable fill material to construct the railway spur in the wetland should be investigated to allow for ground and surface water flow through the spur.</p> <p>Requested Action: Consider comment; edit text with additional detail for clarity.</p>	<p>Comment is noted.</p> <p>EAW has been edited to note that "The railway spur will be constructed with appropriate materials or features to enable water to flow across and/or under the developed surface to facilitate water movement between each side of the railway spur and address the potential for differences in water levels and/or other hydrological impacts."</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
53	6.b	260				<p>RGU notes that the loss of wetlands and peat may have an effect on water levels, CO2 and CH4 flux, sulfate, and mercury concentrations. Likely that monitoring of sulfate and mercury concentrations as well as CO2 and CH4 emissions would be necessary in the surrounding wetlands.</p> <p>Requested Action: Advisory only; it will likely be necessary for the draft scoping decision to specifically address peat excavation and range of potential impacts. Modify submittal text where it makes sense to fill in details on treatment of excavated peat.</p>	<p>See Response to Comment #52.</p> <p>The Project will further address this question, as necessary, in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
54	6.b	260				<p>This section suggests potentially large volumes of peat would be excavated as part of the rail spur construction. Peat excavation is not discussed as part of the mine surface facility construction and it is not clear if this detail is omitted or not required. Further, no specific offsite location is stated for dredged material and it is not possible to assess impacts of these spoils materials.</p> <p>Requested Action: Advisory only; it will likely be necessary for the draft scoping decision to specifically address peat excavation and range of potential impacts. Modify submittal text where it makes sense to fill in details on treatment of excavated peat.</p>	<p>Comment is noted.</p> <p>Based on available data, it is anticipated that most of the peat excavated would be related to the rail spur construction, with the remainder for the other mine surface buildings and facilities. The layout of the other mine surface buildings and facilities was shaped to fit available uploads and avoid, to the extent possible, wetlands areas where peat excavation would be required.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
55	6.b	262				<p>Excavation of peat on state lands may require a state lease for the removal of peat. More detail required to better understand the potential regulatory requirements and identify potential impacts from proposed activity.</p> <p>Requested Action: Consider comment; provide additional detail on proposed action.</p>	<p>Comment is noted.</p> <p>See Response to Comment #54.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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56	6.b	263				<p>Would the peat being "beneficially reused" occur as a land application or by product sale? If land application, this could potentially need additional permitting (not already identified within Section 9).</p> <p>Requested Action: Answer question; modify text if warranted. Future discussion item in development of Draft Scoping Decision Document. If land application is occurring, this would need to be discussed and considered within the GHG and Cumulative effects sections.</p>	<p>The Project does not plan to have a peat stockpile and is actively looking for a beneficial reuse of the peat. The Project is also willing to continue the discussion with the state regarding possible reuses.</p> <p>This was deleted from the EAW: "The peat would be beneficially re-used as a soil amendment to the extent possible at Talon-owned properties or other offsite locations."</p> <p>This was added to the EAW: "The project is seeking a beneficial reuse for the peat at an offsite location."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
57	6.b	263				<p>Detailed information on peat thickness is needed for the DEIS. If peat is proposed to be used at other Talon properties, this should be identified.</p> <p>Requested Action: Advisory only regarding details on peat resource, however any proposed uses should be captured in the document. Future discussion item around treatment of peat, including any potential for offsite transport and any potential impacts for inclusion in the Draft Scoping Decision Document.</p>	<p>Comment is noted.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
58	6.b	265				<p>Upland offsite soil/peat disposal sites should be identified.</p> <p>Requested Action: Consider comment; edit document as needed.</p>	<p>The Project does not plan to have a peat stockpile and is actively looking for a beneficial reuse of the peat. The Project is also willing to continue the discussion with the state regarding possible reuses.</p>	<p>Follow-up. Suitable offsite disposal sites must be identified to satisfy wetland permits.</p> <p>Requested Action: Advisory only.</p>
59	6.b	266			4	<p>In Graphic 4: Three-Dimensional Sketch of Underground Mine Workings, the graphic illustrates the various components that will make up the underground mine features. But the graphic seems to leave out the collection and removal system of the water that infiltrates through the ventilation raises and escapeways. If available, understanding of the project would benefit from inclusion of a graphic of the water collection and removal system. Regardless, a detailed understanding of the proposed system will be required to assess potential impacts.</p> <p>Requested Action: Address comment; modify text and/or provide new graphic if possible. Future discussion item for proposed treatment in the Draft Scoping Decision Document.</p>	<p>Management of underground contact water is described in lines 666-684 of the initial Project Description submission.</p> <p>Graphic 4 displays the mine development excavations, and was not intended to display the layout of underground infrastructure and equipment installations.</p> <p>The exact elevations and placement locations of the underground settling sumps, underground pump stations, piping system routing, and other water handling infrastructure design details will inform the Project's EIS data submission.</p>	<p>Comment 59 has not been adequately addressed. Consider changing the title to indicate Graphic 4 displays the mine development excavations, and not the layout of underground infrastructure and equipment installations. Consider including an additional graphic to indicate layout of underground infrastructure and equipment installations.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
60	6.b	266				<p>This section also discusses the water-tight liner that would be installed and progressively extended as the tunnel advances in order to permanently control ingress of groundwater. Is a leak detection system proposed?</p> <p>Requested Action: Answer question. If yes, then modify text to include this project feature. If no, then provide an explanation why this is the case?</p>	<p>No leakage detection system is planned for the project and is not typical for a tunnel of this nature. The tunnel lining includes dual waterproofing measures: gaskets between the concrete lining segments as well as annular grouting between the extrados of the lining and the ground.</p>	<p>Comment 60 has not been adequately addressed. Consider adding information stating no leakage detection system is planned for the project and is not typical for a tunnel of this nature. The tunnel lining includes dual waterproofing measures: gaskets between the concrete lining segments as well as annular grouting between the extrados of the lining and the ground.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>

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61	6.b	266				<p>If known, what type of maintenance and repair protocol would be applied to the water-tight liner?</p> <p>Requested Action: Answer question.</p>	<p>The gasketed precast concrete segmental lining system proposed for the project is resilient and designed to require minimal maintenance while accommodating the service loads. These types of lining systems are regularly used for tunnels where routine maintenance is challenging without creating a major service disruption (such as a sewer or light rail tunnel). In such tunnels, inspections are typically performed on 5- to 10-year cycles. For the proposed tunnel, detailed lining inspections would be performed on an annual basis. In addition, mine personnel will use the tunnel on a nearly continuous basis during mine operations, and any unusual conditions (such as seeps) that develop can be identified and addressed as they occur.</p> <p>Repair protocols have not been established at this time. Typically, defects that may develop over time include minor cracking or seeps. Defects are evaluated on a case-by-case basis, but significant lining repairs are very rarely required.</p>	<p>Comment 61 has not been adequately addressed. Consider adding text on the liner resiliency and also note that EIS will explore any repairs to the liner.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
62	6.b	266				<p>How long is the water-tight liner projected to last?</p> <p>Requested Action: Answer question.</p>	<p>The gasketed precast concrete segmental lining is typically designed for a 100-year design life. The gasketed lining and annular grout between the lining and ground provide a secondary seal against groundwater ingress. This type of lining system has a well-documented record of satisfactory performance and is commonly used in very demanding operational conditions.</p>	<p>Comment 62 has not been adequately addressed. Consider adding text on the liner resiliency.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
63	6.b	266				<p>Will the water-tight liner be left in place or removed upon mine closure?</p> <p>Requested Action: Answer question.</p>	<p>Yes, the watertight tunnel liner will be left in place upon closure, it is permanently grouted in place.</p>	<p>Comment 63 has not been adequately addressed. Consider adding text that the liner will be left in place upon closure and that it is permanently grouted in place.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
64	6.b	266				<p>When available, the design for the circular access tunnel should be provided. Information should include the final tunnel location, tunnel depth, tunnel diameter, precast concrete liner thickness etc.. It would be helpful to provide figure(s) that show where the tunnel will be constructed in surficial sediments and where it will be constructed in bedrock.</p> <p>Requested Action: Consider comment; edit document as needed. Add figures as suggested.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>

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65	6.b	266				<p>Clarify whether there will be any groundwater inflow during the construction of the loop-shaped declines. It was stated in lines 276-277 that a pressurized-face TBM was selected to drill the loop-shaped tunnel because it can excavate through saturated soils without needing to remove water from the surrounding soils or rock formations. However, in lines 1491-1492, it was stated that the construction of the declines would use a tunnel boring machine, which is able to develop the declines with minimal groundwater inflow from the surrounding unconsolidated sediments. Groundwater inflow must be estimated if there will be minimal inflow during access tunnel construction and groundwater and wetland impacts must be evaluated. A plan for monitoring for groundwater and wetland impacts during decline construction should be developed.</p> <p>Requested Action: Edit document as needed to address comment. Further discussion of issue required to for treatment in Draft Scoping Decision Document.</p>	<p>The tunnel lining includes dual waterproofing measures: gaskets between the concrete lining segments as well as annular grouting between the extrados of the lining and the ground. Final inflow criteria have not yet been established. Based on the historic performance of gasketed precast concrete segmental linings, typical inflow rates range from 1 to 5 gpm / 1,000 feet of tunnel. During construction, any isolated seeps with inflow rates greater than 0.2 gpm typically require supplemental grouting to cut off.</p> <p>Approximately 1,500 feet of the tunnel will be constructed in soft or mixed ground conditions which will have the potential to generate seepage. The remaining length of tunnel will be constructed in rock with extremely low permeability. Inflows of less than 0.5 gpm/1,000 feet of tunnel are anticipated within the rock section.</p> <p>The groundwater seepage estimates and design criteria would be refined during the feasibility and detailed design stages of the project and would be provided for analysis in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
66	6.b	267				<p>Is a separate emergency egress being considered?</p> <p>Requested Action: Answer question.</p>	<p>The mine would be regulated by the Mine Safety and Health Administration (MSHA), an agency within the US Department of Labor. MSHA regulations require all underground mines to have both a primary and secondary egress (escapeway) established before production operations can begin.</p> <p>Two Declines would be developed from surface to the top of the ore deposit, and will be connected in a loop configuration. One of these Declines would serve as the initial segment of the primary escapeway, and the other would be the initial segment of the secondary escapeway.</p> <p>Starting from the top of the ore deposit, a spiral haulage ramp would be developed to follow the ore to its deepest extent. This would form the remainder of the primary escapeway connecting to the bottom of the mine access Declines.</p> <p>Meanwhile, this spiral haulage ramp would be developed alongside a series of connected raises (internal shafts) which would include personnel ladders. These would form the secondary escapeway connecting to the bottom of the mine access Declines.</p> <p>In this manner there would be two separate and independent routes of egress from all production levels of the mine.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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67	6.b	275				<p>It is likely the loaded haul trucks will induce ground-borne vibration as they travel from the working face, through the tunnel, to the surface. It will be necessary to understand what those vibration levels would be, whether there is a potential to induce cracks in the tunnel (creating a pathway for pollutants to enter groundwater) to be evaluated, any monitoring required to monitor for cracks in the tunnel, and how will the tunnel design prevent cracks from allowing pollutants to enter groundwater?</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>The gasketed precast concrete segmental lining system proposed for the project is resilient and designed to require minimal maintenance while accommodating the service loads. These types of lining systems are regularly used for tunnels carrying heavy vehicle, impact, and vibration loads (for light rail and subway tunnels).</p> <p>For the proposed tunnel, daily visual inspections will be conducted as part of Mine Safety and Health Administration requirements, and detailed lining inspections would be performed on an annual basis. In addition, mine personnel will use the tunnel on a nearly continuous basis during mine operations.</p> <p>Additional details regarding liner design and monitoring would be evaluated as part of the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
68	6.b	275				<p>Is monitoring proposed for groundwater to determine if pollutants enter groundwater along the inside or outside of the tunnels throughout the lifespan of the project (and after closure)?</p> <p>Requested Action: Answer question; modify text if warranted.</p>	<p>Any monitoring requirements for the construction, operations, and closure will be an outcome of the Environmental Review and Permitting process.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
69	6.b	276				<p>It is noted that TBM cutting surfaces are abraded as they work. It will be necessary to understand what is the chemical composition of the different cutting surfaces, what metals and other elements could be introduced into groundwater due to this abrasion, in what quantities, and how do those quantities affect surrounding water quality? Similar information could be needed for any lubricants, paints, or other materials that will wear off during TBM use.</p> <p>Requested Action: Advisory only; future discussion item in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
70	6.b	277				<p>It would likely be necessary to assess any changes in groundwater resulting from tunnel boring machine excavation and grouting. This includes changes to aquifers, groundwater flow, and potential changes to wetlands at the surface.</p> <p>Requested Action: Advisory only; future discussion item in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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71	6.b	279				<p>General Question: What dictates the radius of the tunnel arc? Is the tunnel radius determined by the limitations of the TBM or the equipment that will be used in the mine? Is the amount of tunneling minimized?</p> <p>Requested Action: Answer question.</p>	<p>The curve radius of the tunnel has been determined to be 1000 feet based on:</p> <ul style="list-style-type: none"> -The typical steering capabilities of a TBM in this diameter range; -The typical segmental lining design and performance in this diameter range; -Documented successful installation this geometry on previous TBM projects -The minimum amount of tunneling to reach the target area at the maximum gradient allowed by the mine trucks. <p>The cylindrical steel body of a TBM in this diameter range is up to 12m in length. The body (called a "shield") is provided with a sealed articulated joint approximately in the middle. This articulation breaks the cylindrical shield into two halves and is designed to provide the necessary flexibility to negotiate curves and make line and grade adjustments while advancing. Further back, the segmental lining is specifically designed and assembled to match the curve radius excavated by the TBM and provide a balanced thrust force reaction during TBM advance.</p> <p>For safety reasons, the tunnel is straight until the TBM has a sufficient cover of competent rock, after which the 1000 feet curve radius starts. Significant effort has been put into minimizing the amount of tunneling, and will continue to be refined as the design progresses.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
72	6	281				<p>Does Talon propose to assess potential blasting-related impacts in terms of by ground vibration and airblast? Would the environmental or acceptable human response be evaluated? Would a limit to prevent structural damage be evaluated? Would Talon develop ground vibration contours (from blasting), and airblast contours for overpressure levels?</p> <p>Requested Action: Answer questions.</p>	<p>Blasting can also generate low-frequency ground vibrations and air blast. A major mitigation of these effects is that blasting at Tamarack would only occur after the mine access Declines have reached the deep bedrock (over 300 feet below surface elevation and approximately one-half mile laterally from the tunnel opening /Portal). The Project would ensure that any ground vibration aligns with the standards and limits currently set in the Minnesota Permit to Mine regulations. Vibration and noise studies will be conducted to inform the EIS data submittal.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
73	6	281				<p>Regarding assessment of blasting-related impacts, does Talon propose to identify impacts to sensitive receptors, which could include residences, recreational areas or sites, or impacts to tribal members that may have a cultural or spiritual connection to the project vicinity.</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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74	6.b	289				<p>More information on the watertight liner is needed. Will the entire liner be left in place? It will need to be understood how the liner may change hydraulic conductivity in the overburden, saturated unconsolidated sediments and bedrock.</p> <p>Requested Action: Answer question.</p>	<p>The tunnel lining includes dual waterproofing measures: gaskets between the concrete lining segments as well as annular grouting between the extrados of the lining and the ground.</p> <p>The liner installed for mining is permanent and it will not be removed. The tunnel and liner are linear features and will not affect the bulk permeability, hydraulic gradients or flow direction at project scale.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
75	6.b	290				<p>Assessing potential impacts to the surrounding strata would require information on the expected performance of the watertight liner. This would involve a number of considerations. A range of water leakage values (from excellent installation/performance to poor installation/performance) could be expected. Information on the expected lifespan of the liner is needed. Would the liner need to be replaced? What happens to the liner over the long term? This is important given that the current plan is not to backfill the access tunnels in the glacial till.</p> <p>Requested Action: Advisory only; future discussion item in development of Draft Scoping Decision Document, especially in terms of data needs, requisite analyses, and reporting. Edit document where clarification is warranted.</p>	<p>Comment is noted.</p> <p>See Response to Comment #61.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
76	6.b	292				<p>This section describes various features of the two box cuts. However, missing from the box cut descriptions are the handling of the overburden material generated by the box cut and decline excavation process.</p> <p>Requested Action: Consider comment; edit document as needed.</p>	<p>Overburden removed from the box cuts and the Decline excavation will be placed on the dedicated temporary Overburden Stockpile (temporary) managed as per Minnesota Rules, chapter 6132.</p> <p>Lines 498–502 were updated to provide more clarity.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
77	6.b	292				<p>How long will be the overburden be set aside?</p> <p>Requested Action: Answer question.</p>	<p>Potential uses for the overburden material are stated in lines 498–502. The timing and further details of how this material will be used will be more defined in the feasibility design and will be provided for the EIS.</p>	<p>Comment 77 has not been adequately addressed. Consider adding text that defines what the proposer means by "temporary".</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
78	6.b	292				<p>How much of the overburden will be set aside and how much will be used as a backfill for the box cuts?</p> <p>Requested Action: Answer question.</p>	<p>Quantities of overburden material, and what proportion will be used for backfilling the box cuts, is a function of the box cut and tunnel alignment design which is in the process of being refined. The Project will address, as necessary, this issue in the EIS.</p>	<p>Comment 78 has not been adequately addressed. Consider adding text that provides a rough expected overburden volume and the rough proportions of the overburden used in the box cut and for the temporary stockpile.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
79	6.b	292				<p>At mine closing, will these box cuts be removed and the stored overburden used to refill the opening?</p> <p>Requested Action: Answer question.</p>	<p>Comment noted. Future discussion of this item would be part of developing the Draft Scoping Decision Document, and to be further evaluated for the EIS.</p>	<p>Comment 79 has not been adequately addressed. Consider adding text that states the overburden use for refill will be evaluated in the EIS.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>

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80	6.b	292				How will the overburden be protected during its storage? Will there be a cover? How about a liner? Requested Action: Answer question.	Overburden will be managed as per Minnesota Rules, chapter 6132.	Comment 80 has not been adequately addressed. Consider adding text that states the overburden will be managed per Minnesota Rules, Chapter 6132. Requested Action: Consider comment; modify text as warranted.
81	6.b	292				What is the overburden's soil chemistry; is it high in sulfide-bound minerals? Requested Action: Answer question.	The Materials Characterization Program is underway and designed to collect a range of data needed to understand the geochemical constituents of overburden materials. Sulfur data will be collected from the overburden for analysis in the EIS data submission.	Resolved. Requested Action: None.
82	6.b	292				Where is excavation material placed from "box-cut" construction and what is done with groundwater pumped during construction (prior to liner installation). Requested Action: Answer question.	Refer to lines 498 – 502 for details on overburden material handling from the box cuts. Lines 295 – 297 provides detail on the excavation support system that will be designed to minimize groundwater inflow into the box cuts during construction. Minor seepage of water is still expected to leak though the excavation support system, and this water will be treated according to regulatory requirements. Further design of the excavation support system is underway and will be included for evaluation in the EIS.	Resolved. Requested Action: None.
83	6.b	298				More information on the watertight liner is needed. Will the entire liner be left in place? It will need to be understood how the liner may change hydraulic conductivity in the overburden, saturated unconsolidated sediments and bedrock. Requested Action: Answer question.	Since the liner is an impermeable feature, it is not expected to have an impact on the site hydrology or hydrogeology at a project scale. The Project will address this issue, as necessary, in the EIS.	Resolved. Requested Action: None.
84	6.b	312				The EIS would likely evaluate the impact of a pressurized-face Tunnel Boring Machine (TBM) that pressure-pushes its drill bit through a water-saturated substratum of rock and soil by using its own air or water, thrusting aside from the bored hole the groundwater and overburden it displaces. The potential for impacts on the water table and underground water hydraulics during its operations, leading to surface water alterations in a wetland and spongy area like Tamarack, would need to be evaluated. Requested Action: Advisory only; future discussion item in development of Draft Scoping Decision Document.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping. Requested Action: None.

Comment No.	EAW Section	EAW v1 Starting Line No.	Table	Figure	Graphic	Round 1 Comment and RGU Requested Action 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Requested Action 2/5/2024
85	6.b	312		6		<p>Where is the TBM assembled? How is it shipped to the site? What types of maintenance are required?</p> <p>Requested Action: Answer questions; edit text as needed.</p>	<p>The TBM is assembled at the manufacturer facility in Europe, USA, or China to perform shop testing and commissioning of the main functions and systems. After shop acceptance, the TBM is partially disassembled for shipment in transportable sections. From the manufacturer facility truck trailers take all the TBM sub-sections to the closest commercial port for shipment to the USA. From the port of entry (TBD) truck trailers are loaded for transportation to site.</p> <p>Once all the partially assembled elements are received at site, the TBM is re-assembled in its entirety, commissioned, and launched.</p> <p>TBM preventive maintenance is regularly scheduled and performed by the Contractor as per manufacturer recommendations on a daily, weekly, and monthly basis. This is essential to the efficient operation of the TBM as it ultimately minimizes downtime.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
86	6.b	312		6		<p>Need to discuss maintenance requirements/operational constraints of TBM</p> <p>Requested Action: Consider comment; edit text as needed.</p>	<p>Comment is noted.</p> <p>See Response to Comment #85.</p> <p>Operational constraints are addressed during the detailed design process and means and methods analysis and will be provided for the EIS to assess, as necessary.</p>	<p>RGU notes that operational constraints and maintenance requirements of the TBM will be discussed as part of the EIS.</p> <p>Requested Action: Advisory only.</p>
87	6.b	336				<p>What kind of monitoring and control measures will be emplaced to assess potential ground settlement as a result of tunneling with the TBM?</p> <p>Requested Action: Answer question.</p>	<p>TBM tunnels are commonly excavated in soft ground and below sensitive structures in dense urban environments. In these types of environments, TBM mining is required to comply with very tight settlement tolerances. Settlement limits will be proposed by the designer as part of the feasibility design and will be available to assess during the EIS. If the proposed settlement limits need to be adjusted, it will be refined during the detailed design process.</p> <p>Ground monitoring points (i.e., survey targets) would be installed on surface along the TBM alignment at specified intervals to monitor any subsidence while advancing through the soft ground portions of the tunnel. No surface settlements are anticipated in the rock section of the alignment.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
88	6.b	336				<p>In describing the decline that develops beyond the box cut, this section briefly describes the bedrock material referred as the "development rock", but then points the EAW reader to a different section for detailed information, but this section is misidentified as "Overburden and Development Management" rather than the correct Overburden, Development Rock, and Backfill Materials Management section.</p> <p>Requested Action: Consider comment; edit text as needed.</p>	<p>Text updated in the EAW to refer to Overburden, Development Rock, and Backfill Materials Management section.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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89	6.b	337				Development rock is termed waste rock in MN Rules Chapter 6132 which applies to this project. Revise to refer to the various categories or types of rocks with terms that apply in Minnesota. Requested Action: Edit document.	The Project disagrees that development rock is synonymous with waste rock in an underground mining context. Class 1 and Class 2 development rock is going to be reused as part of the mining process. Proposer requests to have further discussion regarding this item.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
90	6.b	338				It does not appear that the temporary overburden storage area will be lined. What is the rationale (as currently known) for not lining the storage area? This is a potential concern since wetland peat will be a portion of overburden removed, which may lead to risk of mercury/methyl mercury leaching after rain events. Requested Action: Answer question. Response will inform development of Draft Scoping Decision Document.	The EAW is correct. The Project does not intend to line the unconsolidated glacial till "overburden". Depending on the geotechnical analysis of the glacial till removed, the Project intends to use this material as construction fill. The pile of unused material will be managed by to comply with Minnesota Rules, chapter 6132. The Project does not plan to have a peat stockpile and is actively looking for a beneficial reuse of the peat. The Project is also willing to continue the discussion with the state regarding possible reuses.	Suggest stating in EAW why it was determined that a liner is not needed. Requested Action: Add text to address comment.
91	6.b	338				Activities defined as temporary will need more discussion and review as they may related to determination of start of construction as well as any electrical generating units as they may need permit authorization prior to being brought onsite. Requested Action: Advisory only. Permitting consideration.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.
92	6.b	340				what is the liner design for the backfill materials storage area? Requested Action: Answer question.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping. Requested Action: None.
93	6.b	340				Describe how the development rock would be staged in the backfill materials storage area including length of time before being used as backfill material, as well as associated geochemical characterization. Requested Action: Consider comment; edit text as needed.	The Backfill Materials Stockpile containing the development rock would have numerous controls and mitigations in place – the stockpile would be lined, would only be in existence for a short period of time, and all runoff and leachate would be sent to the Contact Water Treatment Plant. Additional description of the development rock stockpile can be referenced at lines 543-556 of the initial Project Description submission. Geochemical characterization of the development rock is a key component of the ongoing Materials Characterization Program which will be further developed for the EIS data submission. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.

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94	6.b	343				<p>Provide additional detail on "temporary" facilities that are needed for the TBM operations, including layout, locations, etc.. and which ones are planned to serve a "permanent function" for mine operations, hence not temporary.</p> <p>Requested Action: Consider comment; edit text as needed.</p>	<p>The nature, location and layout of temporary facilities required to support the TBM operations are dependent on the type of pressurized face TBM that will be proposed for the project. The layout of the supporting services will also need to be coordinated with surface construction activities and will change as the design progresses to optimize coordination between surface construction and tunneling activities. A feasibility engineering design will provide conceptual layout, including temporary facilities required for the tunneling activities and will be available for the EIS. Further details on the facilities will be provided for the EIS when the design has progressed further.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
95	6.b	347				<p>What are the noise and/or vibrational effects to the area from the use of the TBM?</p> <p>Requested Action: Answer question. The Draft Scoping Decision Document could identify the need to determine whether this activity could impact species sensitive to noise and vibration (as an EIS issue).</p>	<p>TBM tunneling has been preferred and successfully used in dense urban areas (e.g., downtown New York and Los Angeles). TBM tunneling is selected for these sorts of projects, in part, because of their strict noise and vibration requirements.</p> <p>The rock breaking mechanism of a TBM is based on disc cutting tools continuously rotating against the face, and does not involve any high energy or repeated impacts typical of other mechanical excavation means. In consideration of the depth of the rock section of the tunnel (greater than 130 feet deep) and damping effect generated by the thick soil layer above it, we do not anticipate perceivable noise and vibrational effects to the area. In any case, construction will be in compliance with local/state/federal ordinances.</p>	<p>Comment 95 has not been adequately addressed. Consider adding text that states TBM was selected specifically to minimize vibrational impacts.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
96	6.b	347				<p>There is a brief discussion regarding the use of a temporary water treatment while the permanent water treatment plant is under construction. If known what is the comparison of water output quality and quantity between the temporary and permanent water treatment systems?</p> <p>Requested Action: Answer question.</p>	<p>A Temporary Contact Water Treatment Plant would remove suspended solids from the recirculating flow during Decline construction. Once the boring machine enters the bedrock, small amounts of bedrock water may be encountered. Excavated rock would be placed onto the Backfill Material Storage Facility. This contact water would be collected and treated in the Temporary Contact Water Treatment Plant to remove constituents that could be present in the bedrock and/or released from the development rock. The exact location and design of the Temporary Contact Water Treatment Plant as well as estimates of flow, influent, effluent water quality, and water quality limits would be developed during the EIS.</p>	<p>Comment 102 has not been adequately addressed. Consider adding text that states the water quality will meet Minnesota Rules, Chapter 7050.0220 subpart 3a.</p> <p>Requested Action: None.</p>
97	6.b	347				<p>More information is required regarding the specific parameters that will be treated by the mobile or modular water treatment units, as well as supporting evidence of the parameter removal rates achieved (i.e. bench work, analogue site results, etc..).</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p> <p>See Response to Comment #96.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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98	6.b	347				<p>Detail on mobile/modular water treatment units is needed. How much water is treated by these units? What is their performance? What are their energy and maintenance needs?</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p> <p>See Response to Comment #96.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
99	6.b	347				<p>A more detailed description of the temporary water treatment mobile/modular units (comparable to the TBM description) and expected water parameters that will need treatment to meet standards would assist reviewers in assessing sufficiency of such technology for the initial project phases.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p> <p>See Response to Comment #96.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
100	6.b	347				<p>What does "as necessary" mean for temporary water treatment?</p> <p>Requested Action: Answer question.</p>	<p>"As necessary" means that all water produced during construction that would not meet the relevant discharge standards would be captured and routed to the Temporary Contact Water Treatment Plant prior to discharge.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
101	6.b	347				<p>How long will the temporary water treatment system be used until the permanent system comes online?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Comment 101 has not been adequately addressed. Consider adding text that states a range of time needed for the construction of the permanent water treatment systems so that we have a general idea how long "temporary" means.</p> <p>Requested Action: Modify text to address comment.</p>
102	6.b	347				<p>This section also mentions how the temporary water treatment system's water discharge will meet water quality standards, but whose? Minnesota's? This should be explicitly stated.</p> <p>Requested Action: Consider comment; edit document as needed.</p>	<p>The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
103	6.b	347					<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p> <p>See Response to Comment #96.</p>	<p>Follow Up - Information about how water treatment is proposed to be used during construction is required to prepare the DSDD. While the reviewer appreciates that greater level of detail will be forthcoming at future stages of the project, conceptual information about the type of treatment proposed, what contaminants/types of contaminants will be addressed using treatment, the water body into which water is proposed to be discharged, and the volume of discharge, is required in order to frame the assessment of potential environmental effects in the DSDD. This topic should not be deferred to the EIS as construction phase water treatment and discharge is important for reviewers and the public to understand to develop the DSDD.</p> <p>Requested Action: Advisory; future discussion</p>

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								item as part of developing the Draft Scoping Decision Document
104	6.b	353				Any long term consequences of the TBM, both during the mine operation and after mine closure, would need to be considered. Requested Action: Advisory only; future discussion item in development of Draft Scoping Decision Document.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping. Requested Action: None.
105	6.b	355				The document provides use of the TBM for light rail construction in the Metro Twin Cities. Given these tunnels typically operate at shallower depths than proposed for the Tamarack Mine, it is appropriate to identify examples of TBM usage to greater depths, especially for mining-related applications. Requested Action: Consider comment; provide examples if available.	TBMs have a long track record of successfully completing projects in the same proposed depth range as the Tamarack Mining Project (maximum depth of approximately 400 feet). Some example projects that have been completed are: -Rondout-West Branch Bypass Tunnel, NY (USA): 2.6-mile-long, 14-foot diameter, 900 feet cover -Kanehe / Kailua Sewer Tunnel, HI (USA): 3.3-mile-long, 10-foot diameter, 600 feet cover -Grosvenor Coal Decline Tunnel, (AUS): Twin tunnels, 4,800-feet long, 22-foot diameter, 500 feet cover -Sound Transit North Link Tunnel, WA (USA): 3.8-mile long, 22-foot diameter, 140 feet cover -Diamond Fork Tunnel, UT (USA): 4.3-mile long, 11-foot diameter, 1,000 feet cover -Port Mann Water Supply Tunnel, BC (CAN): 3,300-feet long, 11-foot diameter, 180 feet cover (under Fraser River) -Brightwater , WA (USA):3.8-mile long, 13-foot diameter, 450 feet cover	Comment 107 has not been adequately addressed. Since Minnesota Bedrock Geology Map shows Precambrian Dikes in the project area and thrust faults near-by, there needs to be a brief discussion on how the blasts from the mining cycle would affect these geologic features. Requested Action: Consider comment; modify text as warranted.
106	6.b	355					EAW text updated to provide examples of TBMs used in other mining projects as well as additional information added to why this technique is proposed instead of conventional tunneling techniques.	Resolved. Requested Action: None.
107	6.b	358				In this section, it says "Both [underground development and ore extraction] would utilize conventional drill-and-blast excavation methods to advance the mining "heading." Are seismic impacts predicted? Requested Action: Answer question.	Comment is noted. See Response to Comment #109	Comment 108 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: Add text to address comment.
108	6.b	358				What are the noise and/or vibrational impacts to the area from use of conventional drill-and-blast excavation methods? Requested Action: Answer question. The Draft Scoping Decision Document could identify this as an issue whether this activity could impact species sensitive to noise and vibration.	Comment is noted. See Response to Comment #109	Comment 109 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: Add text to address comment.

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109	6.b	358					<p>Drill-and-blast mining will begin roughly 300 feet below surface, starting from near the bottom of the mine access Declines (which are developed using a tunnel boring machine, which does not involve blasting). Explosives used for the underground drill-and-blast mining will primarily consist of a water-resistant ANFO emulsion which is suitable for use in wet areas, rather than conventional ANFO in “prill” (pellet) form.</p> <p>The detonation of conventional prill ANFO is often incomplete in a wet environment, leaving behind by-products of unreacted ANFO as nitrate, nitrite and ammonia which could potentially impact groundwater. This will be mitigated by using of the water-resistant ANFO emulsion explosive.</p> <p>Additional potential environmental effects of ANFO use include the generation of blasting gases- primarily nitrogen dioxide, carbon monoxide, carbon dioxide, and ammonia. The mine ventilation system will promptly dilute these gases to safe levels (per Mine Safety and Health Administration and/or National Institute for Occupational Safety & Health standards) so that workers can re-enter the mine.</p> <p>Blasting will result in the generation of dust underground, which would be controlled by the mine’s Mine Exhaust Filtration Building.</p> <p>Blasting can also generate low-frequency ground vibrations and air blast. A major mitigation of these effects is that blasting at Tamarack would only occur after the mine access Declines have reached the deep bedrock (over 300 feet below surface elevation and approximately one-half mile laterally from the tunnel opening /Portal). The Project would ensure that any ground vibration aligns with the standards and limits currently set in the Minnesota Permit to Mine regulations. Vibration and noise studies will be conducted to inform the EIS data submittal.</p> <p>An additional mitigation to all the above impacts is the small size of the individual underground blasts. A typical underground blast by the Project would be a small fraction of the size (1-2%) of a conventional surface mine blast.</p>	Resolved. Requested Action: None.
110	6.b	358				<p>The assessment of potential vibration effects will likely require development of a underground seismic profile for explosive detonations.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>See Response to Comment #109</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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111	6.b	358				<p>The document indicates that prior to release, exhaust air would undergo a filtration or scrubbing process to reduce the amount of suspended dust and particulates. Why would the ventilation system be reducing and not eliminating the suspended particulates? Are there limits to efficacy of elimination, and if yes, what would they be?</p> <p>Requested Action: Answer question.</p>	<p>Particulate capture from an underground mine exhaust requires consideration of several factors including the high airflow velocities, high level of dilution of particulates in the airstream, and high moisture levels resulting in saturated/condensing conditions when the air reaches surface.</p> <p>There are no existing examples of an underground metal mine operating a particulate capture system for its ventilation exhaust outlet. The Project has identified multiple dust-capture technologies which may potentially be suitable for this application. Due to the lack of benchmarking data from other mining operations, the Project will provide an estimate of particulate capture efficiency as part of the EIS data submittal once additional engineering work has been completed.</p>	<p>Comment 111 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
112	6.b	358				<p>RGU notes that the EIS could investigate potential health risks associated with suspended dust and particulates.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
113	6.b	358				<p>RGU notes that these EIS could require identification of individual protection measures to safeguard workers from any impacts associated with suspended dust and particulates.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
114	6.b	358				<p>Can an estimate be provided regarding the rate that fresh air would need to be brought in to service the mine such that there is adequate amount of air for the employees and in excess to adequately remove the dust and blasting gasses?</p> <p>Requested Action: Answer question.</p>	<p>The total airflow through the mine workings is currently anticipated to be approximately 440,000 cubic feet per minute (CFM). The ultimate designed mine ventilation airflow quantity will be driven by a number of factors:</p> <ul style="list-style-type: none"> -Dilution of underground vehicle emissions -Rapid clearance of underground dust generated in active working areas where personnel are present -Rapid clearance of blasting gases and dust so that personnel can return underground after blasting -Avoidance of excessively high local air velocities which could result in excessive entrainment of settled dust, or difficulty for personnel walking. 	<p>Comment 114 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>

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115	6.b	358				<p>Is it known whether the dust would include silicate fibers? If so, will ventilation be enough to capture these fibers in order to protect employee health and prevent silicosis?</p> <p>Requested Action: Answer question. The response can be considered in development of the Draft Scoping Decision Document.</p>	<p>Dust in the underground mine would be expected to contain some amount of silicate dust.</p> <p>The Materials Characterization Program is underway and designed to collect a range of data needed to determine the presence of elongate mineral particles in the development rock and ore. This data will be available for the EIS.</p> <p>All underground mines receive inspections by Mine Safety and Health Administration (MSHA) officials on a minimum quarterly interval (at least four inspections per year). A component of these inspections will include sampling of employees' exposure to respirable crystalline silica, to ensure individual exposure over the length of the shift is below the MSHA health standard. In addition, the Project's Health & Safety Department would conduct significant sampling between the regular MSHA inspections.</p> <p>The primary method of control for silica dust underground is to prevent its generation by use of water during potentially dust-generating operations. This includes, but is not limited to:</p> <ul style="list-style-type: none"> - Utilizing wet-drilling processes which inject water through the drill bit as blastholes are being drilled. - Thoroughly wetting down the piles of blasted rock with a water hose before handling or loading. - Using water trucks to dampen haulage routes to prevent generation of roadway dust. <p>The mine ventilation system will provide sufficient airflow velocities to rapidly clear any concentration of dust generated in an individual work area:</p> <ul style="list-style-type: none"> - Additional supplementary controls include enclosed cabs with dust-filtration systems on haul trucks and front end loaders, which are the types of equipment which would typically be most exposed to dust-generating activities. - Personal respirators would also be worn for specialty operations which may generate dust, such as spraying shotcrete. 	<p>Comment 115 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
116	6.b	358					<p>Grouted bolts would not comprise the majority of the total bolts installed during the mine life. These bolts would primarily be utilized in long-term infrastructure areas (such as primary haulage ramps, pump stations). Where a high degree of strength and long-term corrosion resistance is required polyester-based resin grout is most commonly used. The grout is designed to encapsulate the bolt and prevent direct contact with the rock and with groundwater to prevent corrosion. The grout has very low permeability, which minimizes its interaction with groundwater.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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117	6.b	358				<p>What would cause bolt corrosion? Simple oxidation from air? Reaction with the sulfide-laden rock? Acidic gasses from the explosives?</p> <p>Requested Action: Answer question.</p>	<p>Rock bolt corrosion would occur over time and would primarily be caused by a reaction between oxygen, moisture, and corrosive components from the rock. In areas of the mine which will be open for a longer period before being backfilled (typically one year), corrosion-resistant bolts would be used. This could include galvanized bolts, stainless steel bolts, and bolts fully encapsulated in a cementitious or polymer-based resin grout.</p>	<p>Comment 117 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
118	6.b	358				<p>Will there be a sound-dampening curtains over the two surface portals that lead underground?</p> <p>Requested Action: Answer question.</p>	<p>There are currently no plans for use of sound-dampening curtains. The initial blasting would only occur after the mine access Declines have reached the deep bedrock, over 300 feet below surface elevation and approximately one-half mile laterally from the tunnel opening (Portal). The Project will further evaluate noise impacts and any need for additional mitigations as part of the EIS.</p>	<p>Comment 118 has not been adequately addressed. Consider adding text that states due to the quantity of ANFO expected per use for blasting is sufficiently small enough that vast majority of the ambient blasting noise would be absorbed by the surrounding tunnel structure. Also state any sound dampening curtain system on the portal would impede the air flow required for employee safety.</p> <p>Requested Action: Modify text to address comment.</p>
119	6.b	358				<p>Has there been a baseline study conducted for the whole of Aitkin County to determine its past and current seismic profile to establish a seismic baseline?</p> <p>Requested Action: Answer question.</p>	<p>Seismic data is collected by the US Geological Survey throughout the United States, including Aitkin County.</p>	<p>Comment 119 has not been adequately addressed. Since Minnesota Bedrock Geology Map shows Precambrian Dikes in the project area and thrust faults near-by, there needs to be a brief discussion on how despite these features, the 2014 Seismic Hazard Map of Minnesota indicates Aitkin County and western Carlton County are expected to exhibit only 2%–4% g, and that the nearest recorded earthquake was a Magnitude 1 in Nisswa on July 26, 1979.</p> <p>Requested Action: Add text to address comment.</p>
120	6.b	358				<p>After the blasting, fans and ducting are used to remove dust and blasting gasses. Will these be temporary features attached to permanent features, and then having the permanent feature extended farther into the mine?</p> <p>Requested Action: Answer question.</p>	<p>To ventilate after blasting, an auxiliary (forcing) fan will be placed in the nearest location which has flow-through ventilation established. The fan will then pick up the intake air and force it through ducting mounted to the roof of the heading. The opening of the ducting will be located at the end of the heading, establishing airflow which ventilates the area and carries dust and gases back towards the main ventilation circuit.</p> <p>The following diagram illustrates a typical example of the use of an auxiliary forcing fan to ventilate a dead-end heading where blasting would occur.</p>	<p>Comment 120 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>

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121	6.b	358				<p>Will continuous emission monitoring system (CEMS) be used to detect carbon monoxide (CO), carbon dioxide (CO₂), nitrogen dioxide (NO₂), and other gasses from the explosives, from releases from the rock, and from releases due to other human activities?</p> <p>Requested Action: Answer question.</p>	<p>Sensor stations for relevant gases would be placed at the Main Exhaust Stacks as well as numerous other strategic locations throughout the mine to monitor underground air quality after blasting and determine when personnel can re-enter the underground workings. These stations would be networked to a data collection system enabling all sensors to be monitored from surface.</p> <p>Levels of relevant gases would also be monitored during the shift to validate performance of the mine ventilation system to control gases from vehicle emissions. Handheld gas sensors would also be utilized to perform spot-checks at any area where there may be a need to monitor gas levels and a fixed sensor stations is not present.</p> <p>Gases would be controlled to comply with relevant Mine Safety and Health Administration concentration limits for health and safety of personnel working underground.</p>	<p>Comment 121 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
122	6.b	358				<p>How will the blast area and the rest of the mine opening be monitored to ensure air quality compliance?</p> <p>Requested Action: Answer question.</p>	<p>See Response to Comment #121.</p>	<p>Comment 122 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
123	6.b	365					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
124	6.b	365					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
125	6.b	366					<p>Face dimensions (heading sizes) are discussed on lines 403-407 and 436-439 of the 6.b. Project Description section of the Project's initial Environmental Assessment Worksheet submittal.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
126	6.b	370					<p>Blasting residuals, related to the use of explosives in the mine, will be present in the water pumped from the underground mine, as well as the water draining from the lined Backfill Material Stockpile. This water will all be collected, treated, and discharged. Water quality models for both these source waters and potential impacts to groundwater will be developed during the EIS process. See also Response to Comment #102.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
127	6.b	376					<p>See Response to Comment #114 regarding expected underground airflow quantities. The precise amount of fan horsepower required to achieve this airflow will be an output of ongoing engineering studies.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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128	6.b	378					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
129	6.b	397				<p>The three classifications are based on “low-sulfur”, “moderate-sulfur”, and “high-sulfur” levels of sulfate in the rock, with Class 1 being the lowest, and Class 3 being the highest. DNR will work with Talon to establish the appropriate chemical thresholds to classify the rock into those three classifications. The EIS would likely require research literature to support the classifications?</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>The Project is working with the DNR on a material characterization program which will be used to determine the specific classes of material. Data from other sites and the research literature will be incorporated as appropriate.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
130	6.b	397				<p>If known, how often would the development rock be analyzed for their sulfide content?</p> <p>Requested Action: Answer question; edit text as needed.</p>	<p>The development rock would be analyzed for sulfur/sulfide content and assigned a handling classification (Class 1, Class 2, or Class 3) for each separate blast (typically 300-500 tons of rock).</p>	<p>Comment 130 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
131	6.b	397			3, 4		<p>Image caption has been revised to refer to Graphic 4 instead of Graphic 3</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
132	6.b	397				<p>The bedrock that is being excavated deemed as “development rock” will be classified into three classifications based on their sulfur content; over the course of the mine’s life-time, how will the proportions of these three classes of rock vary?</p> <p>Requested Action: Answer question. Future discussion item where the response can be considered in development of the Draft Scoping Decision Document.</p>	<p>The sulfur content of the development rock is anticipated to be relatively higher during pre-production and the first year of production, and relatively lower afterwards. This is due to the varying lithology of the development rock during these periods, which is expected to consist of a higher proportion of intrusive lithologies during the earlier period and a higher proportion of metasediments during the latter period.</p> <p>The variability of the specific classification category (Class 1, Class 2 or Class 3) would be dependent on determination of final categorization criteria as well as pending engineering work for mine development scheduling.</p>	<p>Comment 132 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
133	6.b	408					<p>A Materials Characterization Program is underway and includes a comprehensive suite of static and kinetic test methods run on all lithological units that compose ore and development rock. The Program is conducted with detailed and regular review by the DNR Lands and Minerals Division staff.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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134	6.b	412					The pumping rates from the underground mine will be variable and expected to increase as the mine development increases. However, the pumping rates are expected to be consistent with the mine inflows. The preliminary estimate for peak life-of-mine inflow is 800 – 1,600 gpm (see EAW, starting line # 1344), this is based on preliminary assessment and would be updated with additional data and modeling for the EIS.	Resolved. Requested Action: None.
135	6.b	425				The term “Tamarack Resource Area” is used without defining what this means. Does this reference the Tamarack Intrusive Complex (TIC) or something else that includes the TIC, or a small segment of the TIC? Requested Action: Answer question.	In the context of line 427 of the initial Project Description, “the targeted ore within the Tamarack Resource Area” refers to the area of mineralization inside of the Project Boundary which is intended for extraction as part of the proposed Project. This Area is a subset of the overall Tamarack Intrusive Complex. While exploration drilling has encountered mineralization, to date there has been no resource delineated in the Tamarack Intrusive Complex outside of the Project Boundary.	Comment 135 has not been adequately address at line 583 but has at line 1051. Consider either defining "Tamarack Resource Area" earlier at 583 or duplicate the definition at both places. Requested Action: Modify text to address comment.
136	6.b	425				The ore extraction is targeting the ore rock, and minimizing dilution from unintentional excavation of non-ore rock, but what are the chemical properties of these non-ore rock? Are they sulfate rocks as well? Requested Action: Answer question.	The Materials Characterization Program would cover all lithologies of rock produced as part of mine operations, including lithologies extracted as targeted ore, dilution within the ore, and development rock.	Comment 136 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
137	6.b	425				Will the non-ore rock have a compounding or a synergetic effect on pollution? Requested Action: Answer question.	Characteristics and potential reactivity of each of the rock types would be evaluated as part of the Materials Characterization Program under a work plan approved by the RGU.	Comment 137 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
138	6.b	425			4, 10		Graphic 10 is a simple illustration and is not intended to be an exhaustive depiction of underground mining methods and supporting infrastructure.	Resolved. Requested Action: None.

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139	6.b	425			10	<p>Graphic 10: Simplified Illustration of Underground Mining Method begs the question: what contact exposure to atmospheric air and rain water will the excavated rock have?</p> <p>Requested Action: Answer question.</p>	<p>The ore and the Class 3 (higher-sulfur) development rock would be trucked out of the Portal and brought directly to the Enclosed Ore Storage Building and Rail Loadout Facility. The distance between the Portal and the Ore Storage Building would be approximately 150 yards. Assuming an average haul truck speed of 5 mph this would result in a very brief period of approximately 1 minute when the truckload of ore is not contained within either the mine workings or the Ore Storage Building.</p> <p>The Class 2 and Class 1 (lower-sulfur) development rock would be trucked from the Portal to the Backfill Materials Stockpile, where it would remain for a variable period of time until being used as feedstock for Cemented Rockfill (CRF) at the Cemented Backfill Plant. The stockpile will be lined, with the runoff and leachate collected and pumped to the Contact Water Treatment Plant.</p>	<p>Comment 139 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
140	6.b	444					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Comment 140 has not been adequately addressed. Cement production is greenhouse gas intensive. This source of GHG emissions must be included in an analysis of the projects GHG impacts.</p> <p>Requested Action: Answer question from original comment. Edit text to include estimated emissions from cement.</p>
141	6.b	444					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
142	6.b	444				<p>RGU notes that examination of potential CRF water quality impacts not only involves operations but also through the reclamation and closure phases of the project. This could include consideration of the make-up of the CRF and level of constituents that would be present and/or mobilized in groundwater.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
143	6.b	444					<p>A Materials Characterization Program is underway and includes a comprehensive suite of static and kinetic test methods run on all lithological units that compose ore and development rock. The Program is conducted with detailed and regular review by the DNR Lands and Minerals Division staff. Static and kinetic testing of Cemented Rockfill is included in the program.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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144	6.b	444					<p>CRF will only be made utilizing Class 1 and Class 2 development rock. The Class 3 (higher-reactivity) development rock would not be kept on site for making CRF, instead it would be sent to the out-of-state processing facility along with the ore.</p> <p>The materials characterization static and kinetic testing of the CRF will inform management strategies that will be presented in the EIS data submission.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
145	6.b	444					<p>Refer to lines 468–470.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
146	6.b	444					<p>Refer to lines 468–470.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
147	6.b	444					<p>Refer to lines 468–470.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
148	6.b	445					<p>The potential for supplementary batching of backfill within the underground workings is the subject of ongoing engineering tradeoff studies. Timing-related considerations are an important factor, since the mining of development rock is front-loaded, with the majority of the development rock being generated during pre-production and the initial period of mine production. This material would be consumed to produce backfill at a relatively consistent rate throughout the mine production life until it is depleted and supplemented with purchased aggregates. The development rock would also need to be stored during the interim, and there is very little capacity for storing the material underground.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
149	6.b	445					<p>The strength requirement for the CRF is determined by empirical and numerical modeling, mining method, excavation size and geotechnical conditions. Once the required strength range is established, lab scale testing is conducted on the material planned to be used to produce the CRF. The lab testing provides a recipe specifying the percent of binder required and the binder: water ratio required to achieve the desired strength. Permeability testing is also conducted on the CRF. The Project has followed this process for the initial design of the project. The Project will provide the necessary information for the EIS data submission.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
150	6.b	445					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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151	6.b	450					<p>Corrosion of rock bolts is the primary item which would be addressed using alternative methods and materials as necessary. See Responses to Comments #116 and #117.</p> <p>Other elements of underground infrastructure are readily accessible and available for inspection, maintenance and replacement, as necessary. Corrosion is a common consideration of many underground mines, and equipment such as pumps intended for mining usage are designed by manufacturers to be corrosion-resistant. All underground infrastructure would be inspected, and preventative maintenance performed on a regular schedule.</p>	<p>The discussion of inspection and material specification is noted, but will acid resistant concrete be considered in the initial specifications to minimize impacts of future acid generation?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
152	6.b	452					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
153	6.b	456					<p>Comment is noted.</p> <p>EAW text was edited.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
154	6.b	466					<p>Refer to lines 468–470.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
155	6.b	466					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
156	6	466					<p>Refer to lines 468–470.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
157	6	466					<p>Refer to lines 468–470.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
158	6	466					<p>Refer to lines 468–470.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
159	6	466					<p>Refer to lines 468–470.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
160	6	466					<p>Comment is noted.</p> <p>Refer to lines 468–470. Additional information, analysis and assumptions regarding the crown pillar modeling will be provided for the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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161	6.b	468					Refer to lines 468–470. The Project will address this question, as necessary, in the EIS data submission.	Resolved for the purpose of scoping. Requested Action: None.
162	6.b	468					Details regarding the methodologies and assumptions made for the crown pillar stability assessment will be provided in the EIS submission.	Resolved for the purpose of scoping. Requested Action: None.
163	6.b	469					Details regarding the methodologies and assumptions made for the crown pillar stability assessment will be provided in the EIS submission.	Resolved. Requested Action: None.
164	6.b	471					Comment is noted. The exact volume of development rock expected to be generated will be dependent on final engineering of the layout of the underground workings. The Backfill Materials Stockpile would have adequate capacity to hold the peak anticipated volume of development rock net of the volume utilized for underground backfill up until that time.	Resolved. Requested Action: None.
165	6.b	471					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
166	6.b	473					Refer to lines 468–470. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
167	6.b	477				Is there the possibility that if there isn't an adequate air moving system in the portals, could the exhaust air vented through the exhaust stack system near the secondary portal be sucked back into the portal, returning diluted exhaust air back into the mine, reintroducing unwanted gasses and particulates? Requested Action: Answer question.	Fans will be located at each Portal as well as underground in order to effectuate the mine ventilation airflow pattern, in which air will be drawn into the intake portal, sent down the Intake Decline, directed throughout the mine, sent back up the Exhaust Decline and ultimately exhausted via the Mine Exhaust Stacks. Recirculation of air exhausted from the mine ventilation system is not anticipated to be an issue due to the significant separation distance from the Mine Exhaust Stacks to the Secondary Intake Fan (approximately 250 feet), as shown in Figure 3 of initial Project Description. Also, the vertically-oriented Mine Exhaust Stacks will release the exhaust air at a height several dozen feet above ground level and will direct the air upwards and away from the Portals.	Comment 167 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
168	6.b	477					See Response to Comment #167.	Resolved. Requested Action: None.
169	6.b	477				Like with the Mining Cycle section before, this section says "Prior to release, the exhaust air would undergo a filtration or scrubbing process to reduce the amount of suspended dust and particulates." Why would the ventilation system be reducing and not eliminating the suspended particulates?	See Response to Comment #111.	Comment 169 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.

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						Requested Action: Answer question.		Requested Action: None.
170	6.b	477				Are there any potential impacts from the fact that there will be no frost around the portals in winter? Requested Action: Answer question.	The Project requests additional explanation and context regarding this question.	Thinking behind the comment is the project causing a "warm site environment in winter" and what that could do in the project area? For example, could this lead to too great of temperature gradient in a short span of distance and cause thermal fatigue to the infrastructure exposed to the extreme thermal gradient? Or due to warm temperatures, the site may become some type of refuge for animals (rodents; insects) seeking shelter from the cold? Requested Action: Answer question; modify text as warranted.
171	6.b	478					Underground booster fans and auxiliary fans would help move the air through the mine. An assortment of underground ventilation controls which may include ducting, air doors, regulators, and ventilation stoppings (walls) would also direct the appropriate amount of airflow to the appropriate areas of the underground mine.	Resolved. Requested Action: None.
172	6.b	491				This section describes a water collection system to gather runoff, which would undergo treatment to comply with relevant water quality standards. If known, how often will the water be tested to ensure the water quality standards are met? Requested Action: Answer question.	The specific intervals and timing of water sampling and testing at various locations will be determined in conjunction with the RGU during the permitting process after the EIS is complete.	Comment 172 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
173	6.b	491					Proposer notes that the Cemented Backfill Plant is not analogous to a cement manufacturing plant. Cement would be purchased from an external offsite vendor and delivered to the project site. The Cemented Backfill Plant is, however, analogous to a concrete batch plant. Concrete batching and cement manufacturing have significantly different environmental considerations. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
174	6.b	498					The Materials Characterization Program is underway and designed to collect a range of data needed to understand the geochemical constituents of overburden materials. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.

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175	6.b	498					Overburden (unconsolidated sediments and topsoil) would not be categorized (screened) before they are placed in their respective stockpiles. Overburden and topsoil would be screened before they are removed from the stockpiles to determine if they are suitable for one of the uses described in line 498 – 502.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
176	6.b	498					Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.
177	6.b	498					The Overburden Stockpile (temporary) is currently planned to be 40 feet in height.	Resolved. Requested Action: None.
178	6.b	501					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
179	6.b	501					Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping. Requested Action: None.
180	6.b	501					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
181	6.b	503					Nearly the entire extent of this area of the facility is constructed on uplands without the presence of peat. All this area would have appropriate preparations for construction, including an appropriate degree of soil compaction to prevent differential settlement.	Resolved. Requested Action: None.
182	6.b	503					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
183	6.b	503					The Materials Characterization Program is underway and designed to collect a range of data needed to understand the rock constituents that control acid rock generation and metal leaching. Sulfur is anticipated to be a primary parameter used to classify development rock; additional parameters would be included if they are determined to be proxies for geochemical behavior.	Resolved. Requested Action: None.

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184	6.b	504					<p>Comment is noted.</p> <p>A Materials Characterization Program is underway and includes a comprehensive suite of static and kinetic test methods run on all lithological units that compose ore and development rock. The Program is conducted with detailed and regular review by the DNR Lands and Minerals Division staff. Management plans for development rock will be informed by the geochemical characterization data set.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
185	6.b	504					<p>Comment is noted.</p> <p>A Materials Characterization Program is underway and includes a comprehensive suite of static and kinetic test methods run on all lithological units that compose ore and development rock. The Program is conducted with detailed and regular review by the DNR Lands and Minerals Division staff. Management plans for development rock will be informed by the geochemical characterization data set.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
186	6.b	504					<p>Comment is noted.</p> <p>A Materials Characterization Program is underway and includes a comprehensive suite of static and kinetic test methods run on all lithological units that compose ore and development rock. The program is conducted with detailed and regular review by the DNR Lands and Minerals Division staff to ensure the data set is sufficient for both EIS and a permit to mine application.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
187	6.b	507					<p>The Project has existing drill core that has been sampled for the Materials Characterization Program. The existing core is expected to be sufficient to support the ongoing materials characterization sampling and analyses work. However, the Project has the capacity to drill new core holes if it is determined that additional core is needed for materials characterization.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
188	6.b	507					<p>During mining operations, a sampling procedure will be in place to collect data from development rock as it is blasted and removed from the mine as new tunnels are dug. This sampling procedure will occur after blasting to provide data for use in classifying development rock into categories. The rock will be removed from the mine and placed in the location designated for each category.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
189	6.b	512					<p>See Response to Comment #188.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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190	6.b	514				<p>Will there be a testing regime to determine sulfur content during development?</p> <p>Requested Action: Answer question.</p>	<p>See Response to Comment #188.</p>	<p>Comment 190 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
191	6.b	514					<p>Comment is noted.</p> <p>The Materials Characterization Program is underway and includes a comprehensive suite of static and kinetic test methods run on all lithological units that compose ore and development rock, including the overburden.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
192	6.b	515					<p>When the TBM is briefly crossing the boundary between the overburden and bedrock, it would generate minor quantities of mixed material. Since a minor portion of this material would consist of bedrock, it is not suited for storing in the Overburden Stockpile (temporary). Therefore it would be treated as bedrock (development rock) and stored on the Backfill Materials Stockpile, which has a higher degree of environmental controls (runoff and leachate collected would be sent to the temporary or permanent Contact Water Treatment Plants).</p> <p>The Materials Characterization Program will evaluate the bedrock lithologies and the overburden to confirm criteria for assigning the classification to bedrock (Class 1, 2 or 3) based on levels of potential reactivity. It will also evaluate the potential reactivity of the overburden. During operations, Class 3 (more-reactive) development rock is handled differently from Class 1 and 2 in that Class 3 will be co-mingled with the ore and shipped to the processing facility. This solution is not viable during the pre-construction period when the TBM will be generating development rock, because the rail facilities and processing facility will not yet be constructed. All development rock generated during this period would instead be held on site. The majority of development rock generated during this period is anticipated to be Class 1 or 2 and blending the relatively small volume of Class 3 rock expected to be generated during this period is not anticipated to exceed criteria for Class 2.</p>	<p>Follow Up - Please edit the EAW text to include the first paragraph of the explanation above. Also include a discussion of contingency planning should greater volumes of Class 3 development rock be excavated than anticipated, before the rail facilities and processing facility are constructed. While the reviewer appreciates more detail will be coming later in the process, it would be helpful to have more conceptual detail for underground storage volume capacity</p> <p>Requested Action: Modify text to address comment.</p>
193	6.b	518					<p>See Response to Comment #132.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
194	6.b	520					<p>Comment is noted.</p> <p>See Response to Comment #192.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>

Comment No.	EAW Section	EAW v1 Starting Line No.	Table	Figure	Graphic	Round 1 Comment and RGU Requested Action 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Requested Action 2/5/2024
195	6.b	522					Comment is noted. See Response to Comment #192.	Follow up – The Proposer is encouraged to provide discussion in the DSDD Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document
196	6.b	523					The Backfill Materials Stockpile would have an under-drain with a leak detection system beneath the liner. The specific intervals and timing of water sampling and testing at various locations would be determined in conjunction with the RGU during the permitting process after the EIS is complete.	Resolved. Requested Action: None.
197	6.b	524					Comment noted. See Response to Comment #196.	Resolved. Requested Action: None.
198	6.b	526				Commercial aggregate would be used to make CRF after development rock is depleted. If the potential source(s) is known, has the candidate aggregate been determined and studied as to the chemical reactivity to air and water? Requested Action: Answer question. Response will inform development of Draft Scoping Decision Document, especially in considering potential long-term impacts to groundwater.	Comment is noted. The Project has not yet decided upon the aggregate supplier and source, pending additional data collection and supplier discussions. CRF made using planned aggregate sources will be studied as part of the Materials Characterization Program conducted under an RGU-approved work plan. Future discussion item, as necessary, in development of DSDD.	Comment 198 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
199	6.b	526					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
200	6.b	530					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
201	6.b	536				The document notes proposed use of an appropriate amount of alkaline material to "... neutralize any potential acidity that could be generated from the material." Has the type of alkaline material been determined? Is it lime? Requested Action: Answer question. Response will inform development of Draft Scoping Decision Document.	Comment is noted. The exact type of alkaline material has not yet been determined but could include lime, limestone, cement or other materials. Future discussion item, as necessary, in development of DSDD.	Comment 201 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
202	6.b	536				What are the alkaline material's longevity and effectiveness? Have they been analyzed? Requested Action: Answer question. Response will inform development of Draft Scoping Decision Document.	Comment noted. See Response to Comment #201.	Comment 202 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
203	6.b	536					Specific analysis methods and procedures for how the fines will be analyzed for sulfur content and reactivity will be defined during the permitting process once criteria are further developed.	Not resolved. The issue of how fines will be analyzed should not wait until the permitting process. Please note there currently are placeholders in the waste characterization workplan to discuss this topic in more detail.

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								Requested Action: Consider comment; modify text as warranted.
204	6.b	537					Comment noted. See Response to Comment #201.	Resolved. Requested Action: None.
205	6.b	538					Comment is noted. The Materials Characterization Program includes the 'fines' material. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
206	6.b	541					Comment noted. See Response to Comment #191.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
207	6.b	541					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
208	6.b	541					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
209	6.b	543					Specific details regarding the construction of the liner system at the Backfill Materials Stockpile will be provided as part of the EIS.	Resolved for the purpose of scoping. Requested Action: None.
210	6.b	544					The engineering design for construction of the liner system at the Backfill Materials Stockpile has not yet been completed and will be provided as part of the EIS data submittal.	Resolved for the purpose of scoping. Requested Action: None.
211	6.b	545					Comment is noted. A Fugitive Dust Control Plan will be developed to control fugitive emissions. Future discussion item, as necessary, in development of the DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
212	6.b	547					Comment noted. See Response to Comment #211.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
213	6.b	550					Comment noted. See Response to Comment #211.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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214	6.b	561					<p>Specifics regarding the dust control system within the Cemented Backfill Plant will be discussed as part of the EIS.</p> <p>All underground mines receive inspections by Mine Safety and Health Administration (MSHA) officials on a minimum quarterly interval (at least four inspections per year). A component of these inspections will include sampling of employees' exposure to respirable crystalline silica, to ensure individual exposure over the length of the shift is below the MSHA health standard. In addition, the Project's Health & Safety Department would conduct significant sampling between the regular MSHA inspections.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
215	6.b	563					<p>All deliveries to the site including cement, shotcrete, maintenance deliveries, backfill rock form off site will be considered in the traffic plan. The Project is conducting a traffic study to inform the EIS data submission.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
216	6.b	566		11			<p>The Project intends to develop this as part of the EIS process when the various types of external & lower-volume material flows will be established in more detail.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
217	6.b	566			11	<p>In describing the TBM generating a small quantities of Class 3 development rock when passing through bedrock intervals containing elevated sulfur, and the plan appears to be to blend Class 3 rocks with Class 1 rock to affectively create a Class 2 rock equivalent. However, this process is not shown in Graphic 11: Flowchart of Material Transfer between Surface and Underground.</p> <p>Requested Action: Consider the comment and modify text and/or graphic as indicated.</p>	<p>Graphic 11 is intended to display the primary material flows which will occur once construction is complete and production begins. Temporary material flows during construction are excluded from this graphic as well as lower-volume or external material flows as mentioned in Response to Comment #216. The project intends to develop this as part of the EIS process when the various types of temporary material flows during the construction period will be established in more detail.</p>	<p>Comment 217 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
218	6.b	566			11		<p>Comment is noted.</p> <p>The graphic text was updated.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
219	6.b	569					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
220	6.b	569					<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>

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221	6.b	569				<p>Estimates around the size and frequency of: 1) the number of rail cars; and 2) number of transports per week, are not consistent. Item 20 at Line 2234 says ore would be shipped "approximately every two days." What accounts for this variability?</p> <p>Requested Action: Answer question and try to make the text consistent on this estimate.</p>	<p>Rail shipment size and frequency is not yet precisely defined and will depend on additional analysis and coordination with the BNSF (see Response to Comment #222).</p> <p>The line within Section 20 of the document referenced in the Comment has been edited to match the 2- to 7-day train interval mentioned earlier in the document.</p>	<p>Comment 221 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
222	6.b	569				<p>Are there ways to decrease the number of transports per week but have the amount being transported out be consistent in total tonnage?</p> <p>Requested Action: Answer question.</p>	<p>Reducing the train shipment frequency would require each shipment to be larger, both in terms of ore tonnage and number of cars. This may require an increase in the railcar storage capacity of the railyard and/or an increase in the capacity or size of the Enclosed Ore Storage Building, however this would have the benefit of reduced noise, reduced train traffic, and reduced disruption to road traffic at railway crossings. The precise shipment frequency will also be dependent upon BNSF schedule availability at time of production commencement. Line 587 of the initial Project Description included a range of shipment intervals and sizes which would be further refined as more detail is developed during the EIS process.</p>	<p>Comment 222 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
223	6.b	569				<p>How do these rail transport size and frequency estimates relate to a rate up to 800,000 short ton per year?</p> <p>Requested Action: Answer question.</p>	<p>Shipping ore at a rate of up to 800,000 short tons per year would require 7,273 carloads per year at a railcar capacity of 110 short tons per carload.</p> <p>With an every-two-day shipping interval, this would require approximately 40 railcars per shipment.</p> <p>With a full train length of approximately 120 railcars, this would require approximately 60 shipments per year (slightly more than one per week).</p>	<p>Comment 223 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
224	6.b	570					<p>The capacity of the Enclosed Ore Storage and Rail Loadout Facility as described in the Project Description would provide approximately 4-5 days of storage capacity at full production. Additional ore and Class 3 development rock could be temporarily stored underground in various locations. Underground temporary storage capacity would be very limited at the beginning of the mine life but would be significant once the mine is fully developed. This would enable production operations to continue for an additional period in the event of a temporary rail disruption.</p>	<p>Follow Up - Please update the Ore Transport section to include the above description of approximate ore storage capacity at full production. Discuss further the implications for contingency planning should the volume of ore exceed storage capacity, in the event of a rail disruption.</p> <p>Requested Action: Modify text to address comment.</p>
225	6.b	571					<p>Comment is noted.</p> <p>When applicable, buildings are being designed to meet EPA method 204 total enclosure.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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226	6.b	577					The railcars are expected to be conventional rigid gondolas or side-dump pivoting gondolas. The Project would not utilize bottom-dump railcars. All railcars would have a rigid cover or lid securely attached prior to leaving the Enclosed Rail Loadout Building, which would not be removed until entering the Enclosed Ore Receiving Building at the processing facility. This would provide enclosure of the material in the gondola and enable control of fugitive dust and contact with precipitation.	Resolved. Requested Action: None.
227	6.b	577					Comment is noted. The Project emission inventory will include all fugitive emissions. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
228	6.b	578					Comment is noted. The Project will address, as necessary, this issue in the EIS.	Follow up – The Proposer is encouraged to provide discussion in the DSDD. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document
229	6.b	585					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
230	6.b	586					Materials handling procedures for the event of an extended suspension of production is a subject that will be evaluated as part of the EIS process.	Follow Up - The environmental significance associated with metal leaching materials left on surface during potential periods of temporary closure is high because these materials could generate metal leaching/acid rock drainage that the project as designed is not capable of managing. This could lead to significant environmental risks/impacts. A firm and practical method of ensuring that no ore/class 3 rock is left on surface or otherwise unremediated is required in order to frame this topic appropriately for the DSDD. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document
231	6.b	587					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
232	6.b	589					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.

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233	6.b	596					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
234	6.b	596					<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
235	6.b	598					<p>Please reference line 1361 of the initial EAW Project Description for a preliminary estimate of overall contact water, and lines 1344-1363 for additional description and background.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
236	6.b	606					<p>Please reference line 667-684 of the initial EAW Project Description for management of contact water from the underground mine and 658-663 regarding water treatment. As noted on line 814, details on the water treatment facilities, including anticipated technologies that would be utilized, will be developed and available to support the development of the EIS. Proposer anticipates utilizing a form of reverse-osmosis water treatment technology, in conjunction with other treatment methods.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
237	6.b	615					<p>Ultimately this will be a decision for the RGU.</p> <p>Proposer's current assumption is that the TBM water would be regulated under the Construction General Stormwater Permit due to the short-term duration of the period when this water would be produced, which would all occur while the mine is under construction, and before production begins.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
238	6.b	621					<p>The "Categories of Water" subheading in the project description has been modified to reflect the below. Graphic 12 has also been updated.</p> <p>Non-potable water would include both contact water that has been treated by the Contact water treatment plant, as well as untreated water sourced from the well that would also feed the Potable Water Treatment Plant. This water would be used both underground and on surface, in both the contact area and the industrial stormwater area.</p> <p>-On surface, the water would be utilized for dust control on roadways and stockpiles, washing mobile equipment inside the Maintenance Facility, washing equipment and surfaces inside various buildings, fire suppression sprinkler systems inside various buildings, batching of Cemented Rockfill at the Cemented Backfill Plant, and other minor uses.</p> <p>-Underground, the water would be utilized for cleaning of mobile and fixed equipment, dust suppression during materials handling, dust suppression and drill bit cooling during drilling operations, shotcrete batching, and other minor uses.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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239	6.b	628		3	12		Figure 3 shows the location of the Industrial Stormwater Pond in the northern portion of the site east of the Contact Water Storage Tanks. Both locations are now labelled in Figure 3.	Resolved. Requested Action: None.
240	6.b	629			12		Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
241	6.b	630				The EAW needs to contain what action Talon will take in order to address community's concerns about potential environmental impacts. Requested Action: Address comment and update EAW as appropriate.	The Project has held numerous informal public meetings on a quarterly cadence to gather community input and feedback, which has been utilized in the design of the facilities and development of the Project Description. The Project looks forward to ongoing informal community input combined with the formal public scoping and comment process.	Comment 241 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
242	6.b	630				Specifically describe the "advanced, affective, and sustainable technology" Talon will be utilizing for the proposed project. Requested Action: Address comment and update EAW as appropriate.	Talon Metals is a member of the National Alliance for Water Innovation and has been actively working to identify the most appropriate water treatment technology. The specifics of the flowsheet and treatment technologies will be selected prior to the Project's EIS data submission.	Comment 242 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
243	6.b	630				In the event of an extreme storm event, and the overflow water from the contact water sumps are routed to the lined footprint of the backfill materials storage area to temporarily accept overflow contact water, what happens if the volume is so great that even the backfill materials storage area overflows? Will the lined ditches convey contact water overflow? Requested Action: Answer question.	The Contact Water Collection Sumps and pumping system are designed to handle the inflows generated by the 200-year storm event frequency criteria. The additional storage within the lined footprint of the Backfill Materials Stockpile is provided to retain water within the site the precipitation from a high intensity, short duration 200-year storm event. The lined ditches would convey the contact water overflow from the relevant sumps to the Backfill Materials Stockpile. From the Backfill Materials Stockpile, the water would then be transferred to the Contact Water Storage Tanks.	Resolved. Requested Action: None.
244	6.b	630					Commented noted. See Response to Comment #235	Resolved. Requested Action: None.
245	6.b	630				The above-ground storage tank facility features a secondary containment area in the event of a tank leakage or failure. What are the design volume capacities for the tanks and for the secondary containment area? Requested Action: Address comment and update EAW as appropriate.	The six Contact Water Storage Tanks would have a design capacity of one million gallons each. The design volume capacity for the secondary containment area is one million gallons, to fully contain a complete failure of any one of the tanks.	Comment 245 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.

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246	6.b	630				<p>Are there provisions made for the secondary containment to withstand a 100-year storm event? A 200-year storm event? With climate change impacts, how about a 500-year and 1,000-year storm events?</p> <p>Requested Action: Answer question.</p>	<p>The secondary containment area surrounding the Contact Water Storage Tanks is designed to contain contact water in the event of a leak or failure of any one of the six Contact Water Storage Tanks. It would have sufficient capacity to contain one million gallons, aligned with a complete failure of any of the six (6) one-million-gallon storage tanks.</p> <p>The secondary containment area is not intended to retain precipitation water during normal operations. Runoff from precipitation falling within this area will be treated as industrial stormwater during normal operations and will be routed to the Industrial Stormwater Pond.</p> <p>In the event of a contact water leak from a tank, the appropriate valves and gates would automatically close, preventing the leaking water from escaping the containment area. It would then be pumped into the other (intact) Contact Water Storage Tanks.</p> <p>In the event of a tank failure occurring during a simultaneous storm event, both the contact water from the tank as well as any precipitation falling within the secondary containment area would be treated as contact water and pumped to the other tanks.</p>	<p>Comment 246 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
247	6.b	630				<p>The impact of non-geochemical sources of contaminants should be discussed in the EAW and incorporated into water quality modeling. Specifically, water soluble blasting residue from ANFO should be included in water quality modeling and discussed in the context of water treatment and discharge planning.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>See Response to Comment #109.</p>	<p>Follow Up - The Response to Comment #109 notes that ANFO emulsion will be used rather than prills. This is positive as this action will reduce the amount of ANFO residuals in mine contact water. Nevertheless, this will not eliminate the risk. Analysis of the influence of ANFO residuals on mine contact water and discussion of the resultant risks is required to develop the DSDD. Specifically, development of a water quality model that includes accounting for blasting residuals on mine contact water quality is warranted to develop the DSDD.</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>
248	6.b	633				<p>Throughout the EAW, it is reiterated that treated water will meet the "applicable water quality standards", yet the EAW does not specify what these standards are. Provide a table of the water quality standards the treated effluent is anticipated to meet and how the discharge of treated water of this quality reaches/maintains water quality objectives in the receiving environment. This information is required to understand the project and better assess environmental impacts.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.</p>	<p>Follow Up - Acknowledged. Please note the regulatory framework used as the basis for proposed discharge standards in future documentation to inform the DSDD</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>

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249	6.b	651				<p>How will the integrity of the lined ditches and water sumps be evaluated and ensured through the life of the project? Are the lined ditches and water sumps designed to address larger-than-expected inflows of water? How would overflow of ditches and/or sumps be monitored/addressed?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>All sumps will include level sensors as well as a remote operation and monitoring system for the associated pumps which move the water from the Contact Water Collection Sumps to the Contact Water Storage Tanks at the Contact Water Treatment Plant. Facilities will be regularly inspected as part of preventative maintenance operations. The Project Description has been updated to note this.</p> <p>Further details regarding design and operation of the surface contact water handling system will be addressed as part of the EIS process.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
250	6.b	651				<p>Provide more information regarding how the lined ditches and sumps will be constructed, including hydraulic conductivity estimates for all liner materials.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>All sumps will include level sensors as well as a remote operation and monitoring system for the associated pumps which move the water from the Contact Water Collection Sump to the Contact Water Storage Tanks at the Contact Water Treatment Plant. Facilities will be regularly inspected as part of preventative maintenance operations.</p> <p>Further details regarding design and operation of the surface contact water handling system will be addressed as part of the EIS process.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
251	6.b	653				<p>More discussion is needed regarding using the backfill storage area as a temporary storage area for contact water during extreme storm events. It is unclear how overflow water from the contact water sumps would be routed to the lined footprint of the backfill storage area. It is also unclear how much water the area can hold, whether it is designed to contain standing water, and whether it will have enough storage capacity if there is rock stored in the storage area at the time of a storm event. The maximum amount of water that will need to be stored in the backfill storage area during an extreme storm event must be estimated. The storage volume at the time of maximum rock storage must also be estimated and must be compared to the maximum runoff volume to demonstrate that the backfill storage area will have adequate storage capacity.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
252	6.b	653				<p>Using storage tanks and/or ponds and the secondary containment area to hold all water from an extreme storm event should be evaluated in the EIS in addition to using the backfill storage area to store excess water.</p> <p>Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
253	6.b	654				<p>What is the definition of an "extreme storm"?</p> <p>Requested Action: Answer question.</p>	<p>EAW text was edited to provide a description of an extreme event.</p> <p>"In the event of an extreme storm event (high intensity, short duration),..."</p>	<p>This is not specific enough. Please provide a detailed description of what intensity and what duration storm event</p>

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								Requested Action: Modify text to address comment.
254	6.b	654				<p>Explain the implications of storing both backfill materials (Class 1/2 development rock) and overflow water from the contact water sumps within the same storage area. What is the potential for additional contaminant release when these materials are in the same storage area?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>All water from the Backfill Materials Stockpile (Class 1 and 2 rock) and from the rest of the contact area will be treated by the water treatment facility before being discharged. The Backfill Materials Stockpile would be lined to mitigate risk of release to the environment.</p>	<p>Follow Up - Acknowledged. Please describe this mitigation in the EAW in order to inform the DSDD.</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>
255	6.b	658				<p>The EIS would likely require evaluation of technologies, whether proposed or technically feasible, that can effectively remove high sulfate concentrations from water. This would apply to all sources of contact water, including rock excavated with the TBM as described at Lines 523-525.</p> <p>Requested Action: Advisory only. Future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
256	6.b	660				<p>It is difficult to comment on the types of treatment methods contemplated as information on the quality of influent/contact water, water quality standards, COPCs, effluent quality, etc. are missing from the EAW. Provide this information and clarify whether Talon has conducted/will be conducting assessments to determine the best technology suited for the water at the site.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Follow Up - The quality/amount of mine contact water, the method of treatment, and expected performance of treatment is critical information. These pieces of information directly inform the framework under which mitigation alternatives and residual environmental impacts are assessed. It is acknowledged that the level of detail associated with this component of the project will progress, however it is critical that sufficient information is provided by the Proposer for development of the DSDD.</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>
257	6.b	662				<p>Provide design plans and data to support the statement, "Talon is resolved to have a water treatment solution that meets or exceeds regulatory standards and safeguards water resources."</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
258	6.b	666				<p>The EAW states, "When mining occurs in areas where enhanced permeability zones are expected to be encountered, probe holes would be regularly drilled in front of the advancing mining faces in order to confirm the extent and boundary of the upcoming permeability zone and evaluate the degree of water inflows." Will the degree of water inflows and the volume while mining, as it may be highly variable. How will this be considered with regards to the water treatment plant?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The Contact Water Treatment Plant's design would consider possible variability with regards to inflow rates from enhanced permeability zones. The range of potential inflows and contingency would be refined and incorporated in the Contact Water Treatment Plant's design.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Comment 258 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>

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259	6.b	668				<p>Provide any mapped bedrock zones with enhanced permeability as part of the quantitative groundwater hydrologic model, including, but not limited to, hydraulic conductivity estimates for all bedrock units. Estimates of unanticipated inflow from enhanced permeability zones should be included in the sensitivity and uncertainty testing of the water balance model to estimate maximum inflow volumes.</p> <p>Requested Action: Regulatory guidance. Future discussion item.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
260	6.b	669				<p>The submittal indicated that zones of enhanced permeability exist but does not indicate the cause or locations of these zones. Are the zones of enhanced permeability mapped? What is the basis of believing these zones to be enhanced permeability?</p> <p>Requested Action: Answer questions.</p>	<p>Enhanced permeability zones are inherent to fractured bedrock. Expected spacing, distribution, hydraulic conductivity and modeling methodologies will be provided for the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
261	6.b	669				<p>Holes will be drilled ahead of mining to probe for areas of high water inflow potential. How far ahead of mining? When will the predetermined rate of inflow limits be established? Through a valve? How will inflows be managed? Needs better explanation. Did any core holes intersect faults or high permeability zones? Is there sufficient drilling or geophysics data to model the faults/fissures, an high permeable zones.</p> <p>Requested Action: Answer questions.</p>	<p>It is typical in underground mining for probe holes to be drilled in front of the face as part of the mining cycle, this is typically 56 feet in front of the face for every 42 feet of stope. Further details on the probe drilling grouting plan will be provided for the EIS and in plans of operations. The Project has collected additional data in the bedrock, this is in the process of being analyzed and quality controlled and will be provided for the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
262	6.b	673				<p>What information is available regarding the location of those potential high permeability zones, the flow rates, and the total quantity of flow? Is it possible that zones are connected to the bedrock/till interface?</p> <p>Requested Action: Answer question.</p>	<p>See Response to Comment #260.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
263	6.b	676				<p>How specifically would discrete zones of enhanced permeability be sealed to minimize groundwater inflow and how would potential failures in these attempts be addressed?</p> <p>Requested Action: Answer question.</p>	<p>There are a wide variety of industry standard methods available to manage flow by grouting in front of the face and after an excavation has been created. The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
264	6.b	677				<p>What is the mineralogy and sulfur content of the waste and low grade. Have the core holes been assayed for sulfur in sufficient detail to make a 3D model?</p> <p>Requested Action: Answer question.</p>	<p>The ongoing Materials Characterization Program is collecting a comprehensive data set to characterize the development rock lithologies, which includes mineralogy, and sulfur data. This data will be available for the EIS. Exploration drill core has been assayed for sulfur content, and this data would be used for an initial determination of the distribution and variability within the mine plan.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
265	6.b	677				<p>How fast do the sulfides in the stopes oxidize? How much elapsed time from development of a stope to ARD production if water contacts the stope surface and overbreak fractured ground (i.e., can the stopes be backfilled before metal oxides form that can be washed out if there is a water influx)? Can this be managed by the pumping and water treatment facilities?</p> <p>Requested Action: Answer questions.</p>	<p>The ongoing Materials Characterization Program is collecting a comprehensive data set to be used in groundwater modeling that will be presented during EIS. This includes rates of sulfide oxidation for the development rock. The data set and model will inform the design of water treatment facilities that will be presented during EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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266	6.b	680				Is the grout mixed on site? Or trucked in? Requested Action: Answer question.	This is still under consideration by the Project and will be addressed, as necessary, in the EIS.	Resolved for the purpose of scoping. Requested Action: None.
267	6.b	683				What would necessitate diverting water to storage tanks rather than the water treatment plant? Requested Action: Answer question.	The Contact Water Storage Tanks would be for handling high intensity or long duration storm events where the volume of water in the short term exceeds the design treatment rate of the Contact Water Treatment Plant.	Resolved. Requested Action: None.
268	6.b	685				Talon claims that industrial stormwater would be managed in accordance with the requirements of a future NPDES/SDS permit and an associated Project-specific industrial stormwater pollution prevention plan (SWPPP), but any discharges from the wastewater treatment plant (WWTP) need to be considered with rest of the Project. EIS cannot assume there will be no impacts if NPDES/SDS permit conditions are followed. What will be the estimated discharge rate? One million gallons per day? More? Less? Requested Action: Answer question.	Comment is noted. The Project will address this question, as necessary, in the EIS.	Comment 268 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
269	6.b	685				How will Industrial Stormwater impact Tamarack River, Prairie River, and ultimately Big Sandy Lake? Requested Action: Address comment and update EAW as appropriate.	The potential impacts, if any, to flow and water quality to the Tamarack River, Prairie River, and Big Sandy Lake from industrial stormwater would be evaluated as part of the EIS.	Comment 269 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
270	6.b	691				RGU notes that stormwater quality and quantity impacts to wetlands and public waters will likely be analyzed in the DEIS to support any NPDES permitting. Requested Action: Advisory only; information and analyses necessary to assess impact will be addressed during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
271	6.b	691				More information is requested for details regarding the project-specific industrial stormwater pollution prevention plan (SWPPP) and details for best management practices (BMP) that will be in place to prevent contaminants from entering the watershed. Requested Action: Future discussion item.	Comment is noted.	Resolved. Requested Action: None.
272	6.b	697				How will stormwater be evaluated to ensure it is meeting the appropriate standards? What specific standards will be used? Requested Action: Answer question.	The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.	Follow-up: How will stormwater be evaluated to ensure it is meeting the appropriate standards? Requested Action: Answer question; modify text as warranted.

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273	6.b	699				<p>This section should also mention the permanent treatment requirements for new impervious surfaces in the construction stormwater permit. Must attempt to infiltrate first where possible on site and can then move to stormwater ponding if that is prohibited under the permit.</p> <p>Requested Action: Note comment. Regulatory guidance.</p>	<p>The Project designed the mine site to comply with MN Pollution Control Agency Authorization to Discharge Stormwater Associated with Industrial Activity Under the National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Program. Infiltration systems were discussed but condition 20.6.b of the above referenced program prohibits the construction of a new infiltration system in "Areas with less than (3) feet separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock." Depth to water across the site (Figure 16) is near or less than this requirement.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
274	6.b	706				<p>How will construction stormwater BMPs be evaluated to ensure proper construction and maintenance over the life of the project?</p> <p>Requested Action: Answer question.</p>	<p>Monitoring and maintenance requirements for stormwater BMPs will be an outcome of the Environmental Review and Permitting process.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
275	6.b	707				<p>How will the discharge of treated water change wetland and surface water hydrology? This is very flat terrain and the ability of receiving waters to absorb additional hydrology and move it downgradient must be clearly determined. Any changes that additional water causes to wetland function and value must be defined and disclosed.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
276	6.b	707				<p>Will all construction stormwater BMPs be removed at the end of the project?</p> <p>Requested Action: Answer question.</p>	<p>By the end of the project the construction stormwater BMPs would have been removed.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
277	6.b	707				<p>How will impacts to nearby wetland and/or ditches from construction stormwater discharge be monitored and assessed? What specific standards will be used?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>The specific intervals and timing of water sampling and testing at various locations will be determined in conjunction with the RGU during the permitting process after the EIS is complete.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
278	6.b	714				<p>Same comment as in line 707</p> <p>Requested Action: See GLIFWC-24.</p>	<p>Comment is noted.</p> <p>Is the line number referenced (707) the Comment number?</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
279	6.b	715		5		<p>On Figure 5, recommend adding a clear label or distinction between the public ditch and the natural stream along the discharge route.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The discharge route is a public drainage system along its length from the Mine Site to the Tamarack River.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
280	6.b	715				<p>The capacity of the ditch, as well as the unnamed stream, that will receive treated contact water will need to be determined, as well as the amount of water that will be discharged.</p> <p>Requested Action: Regulatory guidance. Future discussion item.</p>	<p>Public drainage system and stream capacities studies will be conducted, as necessary for the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>

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281	6.b	717				<p>Additional information on the unnamed stream would be beneficial. For example: Will it have adequate flow capacity all year? What are the seasonal effects? Would excessive vegetation limit flow in the summer or ice in the winter? Who has authority over this stream (e.g., access rights for clearing to ensure proper flow).</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	Public drainage system and stream capacity studies will be conducted, as necessary for the EIS.	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
282	6.b	718		5		<p>On Figure 5, Check whether flow direction arrows on County Ditch 23 are correct.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	Flow direction arrows have been corrected on Figure 5.	<p>Resolved.</p> <p>Requested Action: None.</p>
283	6.b	718				<p>How will potential impacts of non-potable treated water on the unnamed stream/tributary of Tamarack River be monitored and assessed? What specific standards will be used?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
284	6.b	719				<p>Impacts to groundwater for all new wells must be analyzed. Cumulative impact analysis of wells along with changes to surficial aquifers from drilling the drifts must be performed.</p> <p>Requested Action: Advisory only; future discussion item during development of the Draft Scoping Decision Document.</p>	<p>All wells are regulated by the Department of Health, the Project will follow MDH guidelines.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
285	6.b	728				<p>Identify plans to work with MDH Drinking Water Protection Section confirming the category of public water supply for this facility and moving forward with compliance with the Safe Drinking Water Act as appropriate for the category of public water supply. This facility will presumably qualify as a noncommunity public water system (PWS). Responsibilities as a PWS should be understood. https://www.health.state.mn.us/communities/environment/water/docs/ncom/noncom.pdf</p> <p>Requested Action: Regulatory guidance. Future discussion item.</p>	Comment is noted.	<p>Follow Up- Prior to construction or alteration of a public water supply system, it is required that complete plans and specifications be submitted to the Minnesota Department of Health Drinking Water Protection Section for approval. This includes plans for treatment, pumping, storage and related facilities.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
286	6.b	728				<p>What type of water treatment? Would there be any water treatment residual waste streams?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The Project is evaluating various water treatment technologies and is also investigating beneficial reuse opportunities for the water treatment residuals that might be produced.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
287	6.b	728				<p>An aquifer pumping test should be completed in wells to obtain estimates of aquifer properties, using additional observation wells where possible.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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288	6.b	728				How will mining activities impact the capture area of the well and chemistry of the well water? How will the chemistry of the well water be monitored and what specific standards will be used? Requested Action: Address comment and update EAW as appropriate.	The potable water well will adhere to State of Minnesota Department of Health guidelines and guidance and the federal Safe Drinking Water Act.	Follow-up: How will mining activities impact the capture area of the well and chemistry of the well water? Requested Action: Answer question; modify text as warranted.
289	6.b	728				How will the safety of the drinking water be ensured? For example, who will test the water and how frequently, what contaminants will be tested for, and what specific standards will be used? Requested Action: Answer question.	The potable water well will adhere to State of Minnesota Department of Health guidelines and guidance and the federal Safe Drinking Water Act.	Resolved. Requested Action: None.
290	6.b	728				Construction of an additional potable water supply well should be reviewed by Well Management Section and Drinking Water Protection Section staff from the Minnesota Department of Health. Proper siting of new wells will be required to ensure all potential contaminant setback distances are met and are maintained for the life of the well and/or project. Identify the proposed water-supply well location including reference to separation distance to potential contamination sources and utilities such as electric, propane, other; e.g. mine site map with wastewater systems, buildings, petroleum storage and piping, buried stormwater ponds and piping, propane storage and piping etc.. Requested Action: Regulatory guidance. Future discussion item.	Comment is noted.	Resolved. Requested Action: None.
291	6.b	731				Provide more detailed information on the sanitary water treatment plant and how and to what standards the water would be treated? Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Comment 291 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
292	6.b	737				How will potential impacts of treated sanitary water to the local watershed be assessed and remediated if there are impacts? Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address this question, as necessary, in the EIS and/or permitting.	Resolved. Requested Action: None.
293	6.b	739				Provide the rationale for combining treated waters for discharge rather than discharging separately. There needs to be more information provided on the receiving water bodies, what volumes and quality of water they can accept, any existing impacts to the waters, etc. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Follow up – The Proposer is encouraged to provide more information at a conceptual level to allow the reviewer to evaluate potential impacts from treated discharge on the receiving environment. Requested Action: Consider comment; modify text as warranted.
294	6.b	743					The nearby Fond du Lac Indian Reservation is not a Federal Class I area; therefore the Project will be evaluated as a Class II. The Project expects this project to be below the PSD threshold for its own air permit, which would not trigger the need to assess increment.	Comment 294 has been adequately addressed. However, by the time EIS is being developed, Fond du Lac may be redesignated as Class I, so the EAW should state that possibility and acknowledge an appropriate modeling will be

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								conducted. Requested Action: None.
295	6.b	743					The water pipelines are within the disturbed Project Area and are linear features that would have minimal to no effect on the flow of water at project scale. The Project is not planning to study the potential flow impacts caused by pipelines.	Comment 295 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
296	6.b	743				Will condensate impacts from the outer pipe-walls due to temperature differences between the pipe and the ground be considered? Requested Action: Future discussion item.	The Project requires clarification of the request.	Comment 296 has not been addressed. Because summers in the Project site tends to be humid, if pipes are significantly cooler, it will cause condensation to form on the outer surface of the pipe. This increase on water availability may alter the vegetation growth, increase insect population. There may be additional impacts caused by the formation of condensation. If impacts from condensation were not considered, state that in the EAW and consider having this impact examined in the EIS. Requested Action: Consider comment; modify text as warranted
297	6.b	743				How impacts of all project utilities would be assessed will need to be identified for the scoping EAW and Draft Scoping Decision Document. Requested Action: Advisory only. Future discussion item that could include consideration of both specific impacts and potential cumulative impacts.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
298	6.b	743				Will an EA or Supplemental EIS be required for the new substation and power distribution system? Requested Action: Address comment and update EAW as appropriate.	No, the substation and power distribution are part of the Project being proposed.	Resolved. Requested Action: None.
299	6.b	743				The EAW speaks of a new electrical substation that will be built to serve the Project. Will this be a 69-kV service? Or will it be a step-down to 46-kV, 34.5-kV, 23-kV, or 14-kV? Requested Action: Address comment and update EAW as appropriate.	The service into the Electrical Substation will be 69kV.	Comment 299 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Change "A new substation..." to "A new 69kV substation..." for clarity. Requested Action: None.
300	6.b	743					Per Minnesota Rules 6132. 2300, subpart. E(4)(b) the Project is required to "remove or provisions made for continued subsequent use" within 3 years unless delay is approved by the commissioner.	Comment 300 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.

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301	6.b	743					Power will be supplied by Lake County power, produced by Great River Energy.	Comment 301 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
302	6.b	743				What kind of emissions increases are expected from the power generation plants in order to service the Project? Requested Action: Future discussion item. DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
303	6.b	743				Can there be onsite or near-onsite electrical power generation that isn't diesel or natural gas that can be employed to decrease the total load from the electrical grid system? Requested Action: Answer question.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
304	6.b	743					Comment is noted. The temporary power generation details are still being considered. The Project will address, as necessary, this issue in the EIS.	Comment 304 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
305	6.b	743					Mitigation of force majeure items would inform the Project's design and would be addressed, as necessary, in the EIS.	Comment 305 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
306	6.b	755				More detailed information on the emergency power is necessary. Will an EA or Supplemental EIS be required? Requested Action: Answer question.	No.	Resolved. Requested Action: None.
307	6.b	757				Fuel tanks will need to be identified and characterized for air quality related impacts. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping. Requested Action: None.
308	6.b	766				How will the integrity of pipelines be ensured? Requested Action: Answer question.	Leak detection and leak mitigation for contact water pipelines will be addressed as part of the EIS. The majority of the length of the contact water pipelines lies within the contact area, any potential leaks from the pipelines within this area would report back to the Contact Water Collection Sumps.	Resolved. Requested Action: None.
309	6.b	766				Will any secondary containment structures be placed around the contact water pipelines to contain potential leaks? Requested Action: Answer question.	Comment is noted. See Response to Comment #308.	Not Resolved - Leak mitigation will be addressed in the EIS. Need to address whether secondary containment will be used around pipelines that are not in the contact area.

Comment No.	EAW Section	EAW v1 Starting Line No.	Table	Figure	Graphic	Round 1 Comment and RGU Requested Action 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Requested Action 2/5/2024
								Requested Action: Modify text to address comment.
310	6.b	771				Support Facilities may include items defined as 'insignificant activities' and will need to be characterized in air quality related impacts. Requested Action: Regulatory guidance. Future discussion item.	The project understands and agrees, insignificant activities are typically examined as part of the EIS and permitting processes.	Resolved. Requested Action: None.
311	6.b	780				What materials will be handled in the cold storage warehouse? Requested Action: Answer question.	The Warehouse will handle spare parts for mining equipment, mine consumables such as rock bolts, and critical spares such as spare electric motors.	Resolved. Requested Action: None.
312	6.b	785				Emissions generated from employee parking lots may also be included in the air quality emission calculations. Requested Action: Regulatory guidance.	MPCA guidance dated July 15, 2021 titled "Interim Paved Road Modeling Practice" states "It is anticipated that lots used exclusively for employee parking may be omitted from the calculations. Emissions from portions of a parking lot used for process-related deliveries will generally need to be calculated."	Resolved. Requested Action: None.
313	6.b	794					The Project looks forward to future discussions on this topic during the EIS alternatives analysis.	Comment 313 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
314	6.b	794					Closure and post-closure plans would be considered as part of the EIS. Financial assurance would be considered as part of the Minnesota Permit to Mine process after the EIS. Large volumes of external aggregates and cement would need to be purchased and transported to site to backfill these areas. At this time there is not a sufficiently defined benefit to such backfilling that would justify the environmental footprint of the production, transport and usage of such large additional quantity of aggregate and cement. When mining is complete, underground engineering controls such as water-tight barriers called bulkheads, or other controls may be constructed at various locations to minimize interaction between the deeper bedrock water and the shallower bedrock water. Other potential mitigation measures, such as increasing the rate of mine flooding would also be evaluated during the EIS. After closure, water from the underground mine would be managed to meet regulatory requirements. At the appropriate time, the mine Portals would be sealed closed with bulkheads as required by Minnesota rules. Reference lines 801-808 in the initial Project Description.	Comment 314 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.

Comment No.	EAW Section	EAW v1 Starting Line No.	Table	Figure	Graphic	Round 1 Comment and RGU Requested Action 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Requested Action 2/5/2024
315	6.b	794					Comment is noted. See Response to Comment #324.	Comment 315 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
316	6.b	794				Add a note stating that regrading would be to match existing grades and natural drainage paths (to maintain conditions/drainage to downstream waterbodies). Specify the type of vegetation that would be used to revegetate the site taking climate change impacts into consideration. Matching the existing (native) vegetation may not make sense 10 to 20 years from now. As line 113 states, "Project water balance and estimated discharge quantities" will be provided at a later date. Requested Action: Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Follow-up. This information will be provided at a later date (in development of DSDD). Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document
317	6.b	798				Clarify how the stockpiles (overburden, development rock) on site will be dealt with in closure. What steps would need to be taken if the mine closed early following an extended period of care and maintenance, including considerations for management of stockpiles, particularly any Class 3 development rock and/or ore left in the rail loadout storage area, and water management? Requested Action: Address comment and update EAW as appropriate.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
318	6.b	800				Any wells constructed on site will require proper sealing once they are no longer in use. Requested Action: Regulatory guidance.	The Project will comply with Minnesota Rules Chapters 4725 and 4727 and Minnesota Statutes Chapter 103I regarding well abandonment.	Resolved. Requested Action: None.
319	6.b	800				The locations and design, including permeability estimates, for any engineering controls to limit water movement should be described. In particular, engineering controls to isolate bedrock groundwater from water in the surficial aquifer should be provided and described. These engineering controls should also be included in post-mining modeling scenarios. Requested Action: Regulatory guidance. Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
320	6.b	801				If known, would method of underground mine closure require perpetual maintenance? Requested Action: Answer question.	The Project's intention is to establish a closure plan which will not require maintenance in perpetuity. This topic will be developed in further detail as part of the EIS pending additional analysis.	Suggest stating in EAW that intention is to establish closure plan that will not require perpetual maintenance. Requested Action: Modify text to address comment.
321	6.b	803				Describe the other mitigation measures that will be evaluated. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping. Requested Action: None.
322	6.b	805				Identify the rationale behind why the mine access declines and development areas will not be backfilled at closure? If the amount of back-fill is the issue then indicate how long-term or perpetual maintenance is planned to be carried out to ensure	Comment is noted. See Response to Comment #314.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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						there isn't a collapse or seepage begin discharged from the access portals? Requested Action: Address comment and update EAW as appropriate.		
323	6.b	806				Which regulatory requirements and how will water from the underground mine be managed to meet those regulatory requirements? This should be explicitly stated. Requested Action: Address comment and update EAW as appropriate.	The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a. See the "Categories of Water" section in the EAW for how this water is managed.	Resolved. Requested Action: None.
324	6.b	806				Comprehensive details on underground water management are needed. Groundwater modeling, using locally collected data, should be done for water quality and quantity. Detail on water treatment needs after closure and clear information on how long treatment and maintenance would be required at the site after mining has stopped are needed. Requested Action: Advisory only. Specifying how this would be accomplished in the document is desirable. Future discussion item in the development of the Draft Scoping Decision Document.	The EIS will address groundwater aspects, including baseline data, hydraulic testing, groundwater model development, and aspects of subsurface contaminant transport, as needed. Water treatment needs during closure and post closure will be addressed in the EIS if ongoing impacts are anticipated or assessed.	Resolved. Requested Action: None.
325	6.c	819				Visual impact analysis for a 78 foot structure is needed Requested Action: Future discussion item in development of the Draft Scoping Decision Document.	Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
326	6.b	823					Comment is noted.	Resolved for the purpose of scoping. Requested Action: None.
327	6.d	823				Include calculations that would support a statement that speaks to the total carbon footprint of the mining operation. How does this carbon footprint compare to the projected savings in carbon emissions from the materials mined from the site? Requested Action: Future discussion item.	A life-cycle-analysis (LCA) will be undertaken to determine carbon impacts once mining and processing plans have been further developed in detail for the EIS.	Follow-up. This information will be provided at a later date (in development of DSDD). Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document
328	6.d	823				EAW Item 6d only requires explanation of project purpose. The objective statement provides information somewhat more appropriate to project need, which is not required for private actions; it is also unsupported in present form. Requested Action: Advisory only. Future RGU decision item.	Comment is noted.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
329	6.d	834				What is the community engagement plan? How has the project already interacted with local communities and what are plans for engagement moving forward? How has or will the project incorporate community input? This information should be included in EIS and more details of what the community engagement plan will consist of should be included in scoping Requested Action: DNR will evaluate available information	The Project has held numerous informal public meetings on a quarterly cadence to gather community input and feedback, which has been utilized in the design of the facilities and development of the Project Description. The Project looks forward to ongoing informal community input combined with the formal public scoping and comment process.	Follow-up: Would like to emphasize that it would be useful to understand at least in a general sense, if not specifically, what the community input/feedback has been surrounding the project as well as whether the project has made or will make any adjustments based on that input/feedback. Also, more details on community meetings such as topics discussed, who attendees were (general

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						during the development of the Scoping EAW to determine the treatment in the EIS.		description), concerns raised, etc. would be helpful in demonstrating meaningful community engagement. Requested Action: Consider comment; modify text as warranted.
330	6.d	838				What are estimates for types of and numbers of jobs needed? What are salary ranges of those jobs? An analysis of the economic impacts to MN/surrounding communities should be included in EIS. More detail on what that analysis will include should be provided in scoping. Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted. The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.
331	6.b	851				Item 11a notes at Line 1112 "[t]he TIC hosts nickel-copper-cobalt sulfide mineralization with associated platinum, palladium, and gold." Recognizing the EQB's guidance is to limit the Monitor notice to 50 words or less, if platinum, palladium, and gold are anticipated to be extracted as marketed (bi-)products, acknowledging this may be warranted in the Monitor project summary or elsewhere in the document. Requested Action: Advisory only; future discussion item as part of developing the purpose statement and ensuring an accurate project description.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
332	6.b	851				EAW Item 6d only requires explanation of project purpose. The objective statement provides information somewhat more appropriate to project need, which is not required for private actions; it is also unsupported in present form. Requested Action: Advisory only. Future RGU decision item.	Comment is noted.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
333	6.b	851				DNR notes that the socioeconomic analysis will likely include projected revenue to the State of Minnesota from the operation. Requested Action: Advisory only. Future discussion item in development of Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
334	6.b	851				Regarding the list of beneficiaries, this is not required for private actions. Requested Action: Advisory only. DNR will determine whether the scoping EAW will contain information regarding project need, including a list of potential beneficiaries.	Comment is noted.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
335	6.b	851					Comment is noted. Future discussion item, as necessary, in development of DSDD.	Comment 335 has not been addressed. Similar to the Objective Statement, the Purpose Statement needs substantial revisions. Requested Action: Advisory only; to be considered in the determination of the Purpose Statement

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336	6.d	855				<p>Sentence states the Cu and Ni concentrate will be shipped outside Minnesota, however iron, as mentioned in line 830, is not included in these concentrates. Clarification needed.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The iron would be present as a byproduct component within the nickel concentrate. There would be no separate iron concentrate product.</p> <p>Note that the concentrates will not be shipped outside Minnesota as there will be no concentrates produced in Minnesota. The raw ore will be produced in Minnesota and then shipped outside the state to Mercer County, North Dakota for processing into the concentrates.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
337	6.d	880				<p>RGU notes that statements in bulleted list are not factually supported. Regardless, remains to be determined how project need would be addressed in the scoping EAW. Not required for private actions.</p> <p>Requested Action: Advisory only. Future RGU decision item.</p>	<p>Comment is noted.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
338	6.e	890				<p>A significant percentage of the ore body is located outside the proposed project. An analysis of the potential for future mining at this site is needed.</p> <p>Requested Action: Advisory only. DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.</p>	<p>Comment is noted.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
339	6.e	890					<p>The "ongoing exploration activity" refers to Talon's exploration activity within the TIC.</p> <p>The Emily Manganese Project is not in the vicinity of the Project Area (it is approximately 40 miles away) and is not what was being referred to by the quoted language in the document.</p>	<p>Comment 339 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Modify text from "There is ongoing exploration activity in the vicinity of the Project Area" to "There is ongoing exploration activity conducted by the Proposer in the vicinity of the Project Area".</p> <p>Requested Action: Modify text to address comment.</p>
340	6.e	890				<p>DNR notes that EIS scope will be re-evaluated if the project changes over the course of the EIS. If the project proceeds, DNR as RGU will monitor its progress for any changes requiring supplemental review or other requirements.</p> <p>Requested Action: Advisory only. DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.</p>	<p>Comment is noted.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
341	6.e	890				<p>Should this box be marked yes? Why is Talon currently doing ongoing exploration in the vicinity of the Project Area if they are not planning on developing on any other property?</p> <p>Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.</p>	<p>Comment is noted.</p> <p>See Response to Comment #338.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
342	6.e	894				<p>Since this project could be the catalyst for future similar efforts, potential cumulative effects should be discussed to address potential for additional mining activity in the area.</p> <p>Requested Action: DNR will evaluate available information</p>	<p>Comment is noted.</p> <p>See Response to Comment #338.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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						during the development of the Scoping EAW to determine the treatment in the EIS.		
343	7.a	901				<p>An exposure assessment to evaluate how climate change impacts may affect the facilities and/or mining operations at all stages of mining should be considered. This will enable the proposer to identify the mitigation and/or adaption strategies needed to address these potential impacts. Consider the overall project timeline:</p> <p>Mine Construction – 2026-2027</p> <p>Mine Operation (10 years) - 2027-2036</p> <p>Site Restoration (approx. 5 years) – 2036 – 2040</p> <p>Consider more than just extreme precipitation. Evaluate the impact(s) of drought conditions, wind, extreme heat, etc.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>
344	7.a	901				<p>It is incorrect to say "climate change will have minimal impact on the location during this time" since impacts of climate change are currently occurring and the rate of change is expected to increase each year. In 10 years, climate change could impact this Project, especially in terms of wildfire events, prolonged drought conditions, and floods.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Climate change is occurring, but other than increases in extreme rainfall which have already been observed, the short duration of the project minimizes the long-term exposure to the impacts of future climate change on the project. The Project will address this issue, as necessary, in the EIS.</p> <p>The EAW's wording has been updated to more clearly communicate this.</p> <p>The edited text reads:</p> <p>"Project operations are anticipated to last 7- to 10-years and therefore long-term climate change, with the exception of the already observed increase in extreme rainfall events, will have minimal impact on the location."</p>	<p>Resolved.</p> <p>Requested Action: None</p>
345	7.a	901			15	<p>In Climate Trends, once anomalies are removed, it appears the annual precipitation for the Mississippi River – Grand Rapids Watershed is trending –0.77-inches/decade. Among the climate trends circles, the word is that we are having less precipitation events, but more precipitation per precipitation event—this makes the likelihood of flood events to become greater. Because of this, although an analysis shown in Graphic 15: Number of 100-year Storm Events from 1916 to 2020 for 38 Stations in Northeast Minnesota is insightful, the EIS must also do similar analyses for 200-year, 500-year, and 1,000-year storm events.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>There was an error in the database used to calculate the initial graph. The graphic has been replaced and the text rewritten. There has been an increase in intense rainfall events as shown by Graphic 15.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>

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346	7.a	906				<p>The EAW includes historical and projected climate data. Conducting an exposure assessment requires evaluating more than just annual temperature and precipitation. The applicant should consider the range of information available as well as the range of scenarios that may impact the facilities as well as the mining operations/processes so that adaptation strategies can be identified accordingly.</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>
347	7.a	910			13, 14	<p>P values should be included with all regressions to show significance, as well as confidence intervals and prediction intervals for all regressions.</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>These graphs come directly from the Minnesota Climate explorer and show a trend line calculated by the program. The graphs are only meant to show general trends.</p>	<p>Follow-up: The trend lines generated using the MN Climate Explorer tool are based on "Ordinary Least Squares Regression," which may not be the best method for discerning statistical trends. They are intended for visual guidance only, and do not imply statistical significance. A more thorough statistical analysis should be performed on any climate trends that are presented in the EIS.</p> <p>Requested Action: If known, add text indicating type of analysis will be used in EIS.</p>
348	7.a	919				<p>Explain why the drought period of 1910-1940 was excluded from the data set and why 1990-2022 is specifically called out.</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>The drought period was removed because it skewed the data set. The period 1990-2022 was used to provide an estimate of the most recent time period.</p>	<p>Not Resolved. The overall annual historical precipitation trends should be used</p> <p>Requested Action: Modify to address comment.</p>
349	7.a	919			14	<p>Historical annual precipitation data and trendlines for Mississippi River - Grand Rapids watershed do not match output from the Minnesota Climate Explorer Tool. Ensure correct data and trends are presented.</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>The data accessed through the Minnesota Climate Explorer has changed since Graphic 14 was prepared for the initial EAW data submittal. Graphic 14 has been updated with annual precipitation data downloaded in September 2023. The annual total precipitation downloaded are identical through 2014. The September 2023 dataset has annual precipitation values for the later years that are greater than previously accessed.</p>	<p>Not resolved. Graphic 14 and slopes reported in text are corrected appropriately. However, the descriptions within the text do not match the updated results. The precipitation trends are all positive (increasing) for the time periods analyzed, but the text still refers to downward trends.</p> <p>Requested Action: Modify to address comment.</p>
350	7.a	930			15	<p>Ensure the proper source is referenced for data presented in Graphic 15. Reference 8 (Minnesota Climate Explorer Tool) does not provide historical data for 100 year storm events.</p> <p>Requested Action: Review and edit as appropriate.</p>	<p>The reference was removed.</p>	<p>Not resolved. The incorrect reference was removed, but no alternative source for the data was provided.</p> <p>Requested Action: Add text to address comment.</p>
351	7.a	938				<p>The statement that "A more detailed analysis of the future climate will be addressed in the EIS" needs to be supplemented with a more complete exposure assessment in order to evaluate climate adaptation and resilience.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>
352	7.a	943				<p>Consider impacts to the railroad corridor. Develop an emergency management plan for the material being hauled to North Dakota in the event of an extreme precipitation event or other accident.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>

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						Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document		
353	7.a	957			17	Graphic 17 shows comparisons for nine models, while the UMN climate projections provide output for only eight models. Clarify whether "Model 1" represents the "Model Mean" or one of the eight models. Requested Action: Address Comment and edit as appropriate	Graphic 17 has been redone to clarify that the one model is the mean of the other 8 models. Replace existing graphs and add footnote defining Model Mean as the mean of the other 8 models	Resolved. Requested Action: None
354	7.a	965			18	Graphic 18 shows comparisons for nine models, while the UMN climate projections provide output for only eight models. Clarify whether "Model 1" represents the "Model Mean" or one of the eight models. Requested Action: Address Comment and edit as appropriate	Graphic 18 has been redone to clarify that the one model is the mean of the other 8 models. Replace existing graphs and add footnote defining Model Mean as the mean of the other 8 models	Resolved. Requested Action: None
355	7.a	969				The exposure assessment should consider all available information when evaluating impacts related to climate change. In addition to the EPA Climate Resilience Evaluation and Awareness Tool, the assessment should consider locally downscaled climate data from UMN, using NOAA Atlas 14 values for the 100-year, 24-hour storm that are on the 90th percentile and storm transposition as an example of an extreme precipitation event. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None
356	7.a	969				Text states "The EPA Streamflow Projections Map anticipates an increase in streamflow by a ratio of 1.2 to 1.4 in 2071-2100 (RCP 8.5)...". Clarify what the reported ratio represents (e.g., projected change in annual average or annual high daily streamflow). Requested Action: Address Comment and edit as appropriate	The EPA Streamflow Projections Map anticipates an increase in annual daily average streamflow by a ratio of > 1.2 to 1.4 in 2071 to 2100 (RCP 8.5) compared to baseline historical flow (1976 to 2005) (reference (13)). Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None
357	7.a	971				This type of information can be further supplemented by running additional scenarios (based on additional sources of information) to evaluate the range of streamflows that may occur in this area as a result of climate change. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	The EPA Streamflow Projections Map anticipates an increase in annual daily average streamflow by a ratio of > 1.2 to 1.4 in 2071 to 2100 (RCP 8.5) compared to baseline historical flow (1976 to 2005) (reference (13)). Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None
358	7.a	972				Changes in climate have already occurred (e.g. increase in frequency/intensity of storm/flood events), so it is not accurate to say climate change will have minimal impact on the project location during the 10 year project period. Requested Action: Address Comment and edit as appropriate	Comment is noted. See Response to Comment #344.	Suggest adding "during proposed project period" to Talon's edit on line 1182 since the site after closure will have exposure to long-term changes in climate Requested Action: Edit text as requested.
359	7.a	972				What if the project extends past 10 years? How will mine impacts be minimized after closure of the mine? Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. As stated in the EAW data submittal "The Project would have an approximately 7- to 10-year production life."	Resolved. Requested Action: None

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360	7.a	973				<p>The exposure assessment should consider the full life cycle of the project including design and construction, mining operations, closure and restoration. It should also consider the full extent of the project including facilities and transportation to the Minnesota/N. Dakota border. Consider projections for mid-century for the exposure assessment.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>
361	7.a	974				<p>Will the frequency of climate related events such as droughts, wildfires, and extreme heat be discussed in the more detailed analysis of climate change impacts during the projects life?</p> <p>Requested Action: Answer Question. Future Discussion Item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>
362	7.b	976	4			<p>What evidence is there to conclude that there won't be climate impacts? In addition to project duration, project magnitude has an effect on climate impacts. Please provide supporting information.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p> <p>See Response to Comment #344.</p>	<p>Comment 362 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Modify text from "long-term climate changes are unlikely to have a major impact on the project" to "long-term climate changes have an unknown impact on the project".</p> <p>Requested Action: Revise text as requested.</p>
363	7.b	979	4			<p>There is insufficient consideration to how long-term climate trends will impact the Project and potential adaptations in project design to reduce impacts and increase project area resilience. Table is incomplete.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p> <p>See Response to Comment #344.</p>	<p>Follow up-This comment also notes that Table 5: Summary of Climate Considerations and Adaptations is incomplete. Suggest that applicant complete the table according to the July 2023 EQB guidance document, Section 3. This proposal notes many impacts to surrounding resources that also have climate considerations (examples are provided in guidance document). There are other changes that are predicted in addition to increases extreme rainfall events that are relevant to this project (e.g. more frequent freeze/thaw cycles).</p> <p>Requested Action: Revise text as requested.</p>
364	7.b	979				<p>This statement does not account for impacts that may occur at the project site after closure.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p> <p>See Response to Comment #344.</p>	<p>Suggest adding "during proposed project period" to Talon's edit on line 1182 since the site after closure will have exposure to long-term changes in climate</p> <p>Requested Action: Edit text as requested.</p>
365	7.b	979	4			<p>More discussion is needed regarding future storm intensities and the design storm size that will be used in the storm water model, and will be used to size storm water and water treatment infrastructure. Also, provide information to explain why a 200-year, 24-hour storm was proposed as the design storm size that will be used to design the storm water management plan and how it was determined to be adequate. Table 4 lacks key details on Project Information and</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>

Comment No.	EAW Section	EAW v1 Starting Line No.	Table	Figure	Graphic	Round 1 Comment and RGU Requested Action 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Requested Action 2/5/2024
						Adaptations. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document		
366	7.b	979				Details of how the recent historic increase in intense rainfalls are incorporated into project design should be provided in the EAW, including assumptions of rainfall depth, distribution and frequency, and how the design accounts for these rainfalls. Requested Action: Consider comment; edit text as warranted.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None
367	7.b	983	4			Increases in precipitation intensity in the Great Lakes region due to climate change are statistically significant. The region has experienced several 500 and 1000 year events over the past 10-15 years. Does the design of the mine at a minimum accommodate a 500 year precipitation event? Also, does the design account for the probable maximum flood for the area? Requested Action: Address comment and edit as appropriate. These are factors likely to be considered in project-related impact assessment modeling. Future discussion item in the development of the Draft Scoping Decision Document.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. Future discussion item, as necessary, in development of DSDD. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None
368	7.b	983	4			Explain how water resources will be unaffected if wetlands will be lost and flooding could occur. Requested Action: Consider comment; edit text as warranted.	Stormwater will be managed onsite either in the Industrial Stormwater Pond or in the Contact Water Storage Tanks which will minimize impacts on water resources. The Project will evaluate this issue, as necessary, in the EIS	RGU notes that FSD will require complete assessment of project-related cover type change and water management and potential for impacts. Requested Action: Advisory only.
369	7.b	984	4			Consider all phases of the project including construction phase, operational phase, post-mining/restoration phase. The content in Table 4 appears to consider impacts to the facilities after they have been constructed. It will be important to evaluate impacts (e.g., extreme precipitation event) during construction in order to assess impacts to the stormwater management and erosion and sediment control plan. Similarly, it would be important to evaluate impacts/conditions post-project and assess impacts to the restoration plans (e.g., seasonal temperature and precipitation changes, minimum and maximum extremes, impacts to vegetation establishment and viability). An assessment of how an extreme precipitation event could impact mining operations would be important. An emergency response plan to address these impacts should also be established. Requested Action: Consider comment; edit text as warranted.	Comment is noted. The Project will address this issue, as necessary, in the EIS.	Resolved for the purpose of scoping. Requested Action: None
370	7.b	984	4			Consider additional adaptation strategies like planting native vegetation that also improve biodiversity and wildlife habitat. Requested Action: Consider comment; edit text as warranted.	Additional buffer strips and vegetation would be planted where feasible. Native species would be used to improve biodiversity and wildlife habitat where feasible.	Resolved. Requested Action: None
371	7.b	985				This conclusion cannot be made based on the lack of relevant information presented in the EAW. Please provide the rationale and supporting data (i.e. animated effluent water quality, studies assessing potential impacts of discharge on	Comment is noted.	Follow Up – Proposer is encouraged to modify the text of the EAW as per the comment. Requested Action: Edit text as requested.

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						fish/wildlife/plant ecosystems in receiving water bodies, etc..) to substantiate this claim. Requested Action: Consider comment; edit text as warranted.		
372	7.b	985				Evaluating impacts related to climate change and adaptation is a requirement of the EAW and needs to be conducted regardless of the size of the project. By completing an exposure assessment of the facilities as well as the processes, the Proposer and the State of Minnesota can more accurately evaluate the need to incorporate adaptation strategies to protect the facilities as well as the surrounding environment and communities. This assessment should consider data beyond annual averages in precipitation and temperature as the facilities and processes will likely be more vulnerable to seasonal and/or monthly variations as well as daily variation (e.g., higher nighttime lows). The proposer should consider all climate-related impacts including more frequent extreme precipitation events, drought conditions, temperature (i.e., warmer winters and nights, increased summer heat). Requested Action: Consider comment; edit text as warranted.	Comment is noted. The Project will address this issue, as necessary, in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None
373	8	988	5			In Table 5, Please provide clarification on where the wetland cover type change is occurring. Requested Action: Consider comment; edit text as warranted.	Clarification is needed to answer this question. Table 5 shows the reduction in wetlands due to project activities. What information is being requested that the table does not provide?	Resolved Requested Action: None.
374	8	988	6			Were possible future green infrastructure and incorporation into project design considered when developing Table 6? Requested Action: Answer question.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope. The Project designed the mine site to minimize the loss of wetlands and to comply with MN Pollution Control Agency Authorization to Discharge Stormwater Associated with Industrial Activity Under the National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Program. Infiltration systems were discussed but condition 20.6.b of the above referenced program prohibits the construction of a new infiltration system in "Areas with less than (3) feet separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock." Depth to water across the site (Figure 16) is near or less than this requirement.	Resolved for the purpose of scoping. Requested Action: None.

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375	8	990	5			<p>Google Earth suggests that there are potential ditches or water conveyances that should be considered. This is mentioned within the document but isn't identified within Table 5. Are these included within the wetlands/shallow lakes category?</p> <p>Requested Action:</p>	<p>Ditches were included in the wetlands and shallow lakes category in Table 5. Hydric ditches are classified as linear basins or depressional areas that meet all three wetland criteria but are confined to the bed and bank of a ditch.</p> <p>Modified Table 5 in EAW to say "Wetlands, shallow lakes (<2 meters deep) and ditches "for row 1.</p>	<p>Resolved</p> <p>Requested Action: None.</p>
376	8	991	5, 6, 7			<p>Tables 5, 6, and 7 appear to be incomplete or incorrect. Given that impacts related to climate change have not been evaluated, and the stormwater management plan and restoration plans have not been completed, it is extremely difficult to assess proposed cover types, proposed green infrastructure, and proposed tree coverage.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>
377	8	994	5			<p>Describe changes in carbon sequestration due to changes in cover type. (983, Table 4)</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>Comment is noted.</p> <p>Please see Table 4, Project Design row, Project Information column.</p>	<p>Resolved</p> <p>Requested Action: None.</p>
378	8	994	5			<p>The table indicates that brush/grassland will increase as a result of the project. Is this due to the loss or conversion of wetlands?</p> <p>Requested Action: Answer question. Edit text as necessary</p>	<p>There are 4 cover types being converted to impervious surfaces as shown in Table 5. These include wetlands/shallow lakes/ditches, wooded/forest, brush/grassland and livestock range/pasture land. At closure, cover types that were converted during construction will be regraded, stabilized/revegetated and allowed to naturally return to native grasses and wildflowers, thus increasing the amount of native grassland and decreasing the amount of other cover types in Table 5. For more information, please see the Reclamation and Closure section in the Project Description of the EAW.</p>	<p>Resolved</p> <p>Requested Action: None.</p>
379	8	994	5			<p>Mitigation strategies are discussed in lines 1448-1464.</p> <p>Requested Action: Do not forward to proposer</p>	<p>Not intended to be sent to the proposer.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action:</p>
380	8	994	5			<p>How will the impervious area decrease? Will impervious areas be removed after the mine is closed? How will that be done? What restoration for the land is planned after mine closure?</p> <p>Requested Action: Answer Questions; Future discussion item for development of the Draft Scoping Decision Document</p>	<p>As indicated in Table 5, during operations, there is an increase in impervious surfaces. As discussed in Response to Comment #378, these surfaces will be reclaimed and revegetated, decreasing the acreage of impervious surfaces.</p>	<p>Follow-up: This issue will continue to be of issue as the project progresses.</p> <p>Requested Action: Advisory only.</p>

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381	8	996	6			<p>It is noted that no green infrastructure is proposed. Permeable pavement and infiltration systems to mitigate for increase in impervious surfaces/wetland loss should be considered.</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.</p> <p>The Project designed the mine site to minimize the loss of wetlands and to comply with MN Pollution Control Agency Authorization to Discharge Stormwater Associated with Industrial Activity Under the National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) Program. Infiltration systems were discussed but condition 20.6.b of the above referenced program prohibits the construction of a new infiltration system in "Areas with less than (3) feet separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock." Depth to water across the site (Figure 16) is near or less than this requirement.</p>	<p>Resolved</p> <p>Requested Action: None</p>
382	8	999	7			<p>The potential noise reduction associated with vegetated strips of land are oversimplified in Reference 50 and incorrectly summarized in the text. An ISO9613-based propagation model can evaluate that potential noise reduction but only if spectral noise emissions data is entered for the noise sources. Vegetation alone provides more noise reduction in high frequencies and much less reduction to lower frequencies.</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>
383	9	1001	8			<p>An Underground Injection Control (UIC) Permit is identified as needed from the US EPA. The EAW and accompanying documentation do not include information about why a UIC permit is necessary. If there will be a UIC permit, there should be a discussion in the project description (item 6b) on what activity or activities would require this.</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>Comment is noted.</p> <p>Currently, the need for a UIC permit is undetermined.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
384	9	1008	8			<p>Include the Office of the State Archaeologist (OSA) License. This will be require for archaeologists working on non-federal state and public Lands.</p> <p>Requested Action: Advisory</p>	<p>Comment is noted.</p>	<p>Not resolved.</p> <p>Requested Action: Add text as original comment requested.</p>
385	9	1008				<p>The document identifies the need for a MnDOT approval for a Railroad Warning Signal Operator License. Are there any other federal, state, or local permits or approvals required for ore to be shipped by rail on the existing BNSF line from Tamarack MN to the processing facility in North Dakota?</p> <p>Requested Action: Answer question.</p>	<p>The Project has identified potential permits that the project could require for in Table 8. If the RGU identifies other applicable permits, please advise.</p>	<p>Resolved for the purpose of scoping. DNR will assess need for any additional permits/approvals over the course of the EIS.</p> <p>Requested Action: None.</p>

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386	9	1008				If known, what federal, state, or local permits and approvals are needed for the North Dakota project components? Requested Action: Answer question.	Talon will be scoping the permitting process for North Dakota in conjunction with the North Dakota Department of Environmental Quality (DEQ) and applicable federal agencies. The North Dakota project is also undergoing a federal NEPA environmental review process in line with requirements associated with the Department of Energy grant for development of the facility.	Resolved. Requested Action: None.
387	10.a.i	1017				There should be a discussion regarding safeguard of Tribal treaty resources in this section. Requested Action: Address comment; modify text as warranted.	The Project would appreciate guidance and discussion from the RGU on how to address this Comment. The Project sees this as a future topic of discussion in the development of the DSDD.	Comment 387 has not been addressed. Consider stating "The Project is located near the adjudicated 1854 Treaty area. Impacts to Tribal treaty resources will be further examined in the EIS." Requested Action: Modify text to address comment.
388	10.a.i	1017				This section describes snowmobile trails in the Project area, but neglects to mention that portions of Savanna State Forest are there, and if flooding happens, how the project may impact Grayling Marsh Wildlife Management Area (WMA). Requested Action: Consider comment; edit text as warranted.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.	Comment 388 has not been addressed. Consider describing Savanna State Forest and Grayling Wildlife Management Area uses that includes but are not limited to hunting. Requested Action: Modify text to address comment.
389	10.a.i	1017				Perhaps a further discussion in Question 15: Historic Properties would be warranted, but in this section there should be a short acknowledgement that in the past Native American Tribes have used the wetland complex as burial grounds. Requested Action: Consider comment; edit text as warranted. Future discussion topic in development of Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
390	10.a.i	1019				The land use description is limited to a very small area near the Project area. Given that the description of water discharges in two HUC-12 watersheds that the Project lies within, it would be appropriate to also list WMAs and State Parks that lie downstream of project area. Requested Action: Consider comment; edit text as warranted.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
391	10.a.i	1019				DNR notes the state water quality standard for sulfate in wild rice waters is 10mg/L. The EIS scope will likely require identification of wild rice waters and subsequent assessment for project-related discharges to adversely impact these resources (if present) due to project-related sulfate contributions. Requested Action: Advisory only; modify text if needed	Comment is noted. The Project will address this question, as necessary, in the EIS.	Resolved for the purpose of scoping. Requested Action: None.
392	10.a.i	1021				Typo: mission punctuation after 'infrastructure' Requested Action: Edit EAW	Comment is noted. EAW has been updated.	Resolved. Requested Action: None.
393	10.a.i	1021				Sentence is stated twice. Remove duplicate. Requested Action: Edit EAW	Comment is noted. EAW has been updated.	Resolved. Requested Action: None.

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394	10.a.i	1028				<p>The project could potentially result in the loss of public hunting land. This issue will need to be considered in the development of the Draft Scoping Decision Document.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
395	10.a.ii	1042				<p>The text indicates that the Project would result in further conversion of land use from open to industrial, but does not describe how the Aitkin County Comprehensive Land Use Management Plan assessed such conversion. Additional detail should be provided.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
396	10.a.iii	1051		6		<p>There is no figure that clearly illustrates public vs private land. That could be on this figure or a separate figure.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>The Project added state/private land designation to Figure 6.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
397	10.a.iii	1058				<p>The text provides reference to the Aitkin County Mining and Reclamation Ordinance, but provides no detail regarding the contents of the ordinance. Additional detail should be provided.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p> <p>For further details concerning the contents of the Ordinance, please see Reference 17 of the EAW.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
398	10.a.iv	1066				<p>FEMA is updating their floodplain mapping. What data was used to make this determination?</p> <p>Requested Action: Answer Question; edit text as needed</p>	<p>The reference is located on Figure 13.</p> <p>FEMA Flood Insurance Rate Map (FIRM)</p> <p>2706280210B eff date 3/15/1982</p> <p>2706280220B eff date 3/15/1982</p> <p>2706280300B eff date 3/15/1982</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
399	10.a.iv	1066				<p>Even if the areas are not "identified as at risk for localized flooding" the EIS needs to evaluate the potential for localized flooding during extreme weather events.</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
400	10.b	1067				<p>These areas have yet to be identified. FEMA floodplain mapping is outdated. Hydrologic and hydraulic modeling is needed to identify flood extents and areas at risk for localized flooding.</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD. The Project will keep monitoring FEMA floodplain mapping for updates as the project progresses through the environmental review process.</p>	<p>Response implies that FEMA is the only source of information for floodplain mapping. The FEMA floodplain maps are one source of information that should be used to evaluate impacts to the project. Hydrologic and hydraulic modeling will still be needed to identify flood extents and areas at risk for localized flooding (taking existing and future climatic conditions into consideration).</p> <p>Requested Action: Modify text to address comment.</p>

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401	10.b	1070				<p>The text states that conversion of land use from open to industrial would occur, but makes no statement regarding the land zoned as city. The conversion or non-conversion of city-zoned land should be described and its compatibility with zoning should be discussed.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>As described in the Land Use section of the EAW lines 1038 and 1039, "The City of Tamarack is currently in the process of developing a comprehensive land use plan." Land is zoned by Aitkin County. Compatibility will be assessed as the City completes their land use plan.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
402	6.b	1084				<p>The RGU offers the following notes:</p> <ol style="list-style-type: none"> 1. The document should provide a high-level summary of what is known on the geochemical characterization of the overburden or any rock types. Furthermore, mineralogy and geological information should be used to develop the geochemical rock types for the project based on expert geochemists and geologists site knowledge. 2. Once the geochemical rock types are understood, the project geochemists should assess the potential for acid rock drainage and metal leaching. NPR criteria for the project should be developed and proposed for review to support treatment of the issue in the EIS. 3. If known, the document should discuss the expected quantities of each rock type and a high level schedule of year over year extraction of different rock types. More precise estimates would likely be required for the EIS. <p>Requested Action: Consider comment and edit text where anything is known at this time. Future discussion item for treatment of topic in Draft Scoping Decision Document.</p>	<p>A Materials Characterization Program is underway and includes a full suite of static and kinetic test methods. The Program is conducted with detailed and regular review by the DNR Lands and Minerals Division staff. A comprehensive data set is being collected from representative samples of development rock to understand mineralogy and how it relates to ARD and metal leaching. Geochemical characterization of development rock will be available for the EIS and mine permitting.</p>	<p>Follow Up – The Proposer is encouraged develop discussion of this topic within the DSDD to allow reviewers to identify and assess potential significant environmental issues.</p> <p>Requested Action: Advisory.</p>
403	11.a	1084		6, 7		<p>A more detailed description of the surficial and bedrock geology at the project site is needed. The description could be constructed from drill logs and other sources of site specific geologic information and include descriptions of all major surficial and bedrock units at the project site. The geologic description should describe all faults, fractures and aquifers in the area and identify any other susceptible geologic features. Maps and cross-sectional drawings showing the locations and thicknesses of the different surficial and bedrock units, locations of faults and fractures and other susceptible features and horizontal extents of the of the different surficial and bedrock units should also be described and mapped.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Detailed descriptions of the surficial and bedrock geology will be provided in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
404	11.a	1100				<p>There needs to be a discussion of structure and hydrogeology somewhere in this section</p>	<p>Structural geology and further detailed hydrogeology (groundwater) of the Project will be provided in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p>

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						Requested Action: Consider comment; edit text as warranted.		Requested Action: None.
405	All EAW	1100				<p>New Comment for Line 1100: The EAW should identify that mineralogical characterization would include acid-base accounting and dynamic testing, including the supporting technical data/information required to conduct the analyses.</p> <p>New Comment for Lines 1307-1311: The EAW should identify that hydrogeologic modeling is necessary, including the supporting technical data/information required to conduct the analyses.</p> <p>New Comment for Lines 468-470: The EAW should identify that rock dynamics/subsidence modeling is necessary, the supporting technical data/information required to conduct the analyses.</p> <p>New Comment for Line 172-177: General comment. The Project Description and other relevant items should provide supply consumption estimates as appropriate.</p> <p>Requested Action: Address comment; modify text if warranted.</p>	<p>1) A Materials Characterization Program is underway and includes a comprehensive suite of static and kinetic test methods run on all lithological units that compose ore and development rock. The Program is conducted with detailed and regular review by the DNR Lands and Minerals Division staff. The planned use of conceptual and mathematical models to support the EIS is discussed on lines 1307-1311.</p> <p>2) The planned use of conceptual and mathematical models to support the EIS is discussed on lines 1307-1311.</p> <p>3) Comment is noted. Revised EAW text to include "Additional subsidence analysis and supporting data will be incorporated into the EIS data submission."</p> <p>4) The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
406	11.a	1101				<p>Note, some of the geology terminology is unclear or incorrect. For example, it is stated the Thomson Formation (incorrectly spelled as Thompson) consists of "metamorphosed sediments". Note, sediments are not a rock type. Classically the Thomson Formation is described as consisting of intercalated slate, siltstone, and graywacke. Also, "hornfels grade" is not technically accurate. Hornfels is a metamorphic facies not a metamorphic grade. The hornfels facies metamorphic grade increases from Albite-Epidote => Hornblende => Pyroxene. Lastly, the major metamorphic event history for the Thomson Formation is regional metamorphism during the Penokean Orogeny followed by thermal metamorphism during the Mid-Continent Rift event.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted. Text updated.</p> <p>EAW Text Update – "Bedrock in the Project Area consists of ultramafic to mafic igneous rock of the Tamarack Intrusive Complex (TIC) related to the early evolutions of the 1.1 billion years ago (Ga) Mid-Continent Rift which intruded into slates and graywackes of the Thomson Formation (Figure 8) (references (19); (20)). The Thomson Formation is part of the of the Paleoproterozoic Animikie Group which consists of metasedimentary rocks that were deposited in a deep-water basin that formed adjacent to a newly forming mountain belt to the south during the Penokean Orogeny (approximately 1.8 Ga) and subsequently were regionally metamorphosed. In the Project Area the Thomson Formation has been further contact metamorphosed by the intrusion of the TIC in a zone approximately 100-300 feet thick along the TIC contact (reference (20)). The Thomson Formation strata are folded by nearly upright, open regional folds with single, subvertical axial-planar slaty cleavage (reference (20)). Sedimentary rock of the Cretaceous Coleraine Formation is regionally present overlying the Thomson formation though it is not mapped in the Project Area."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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407	6.b	1112				<p>The document lacks any information of the geochemical characterization of the Class 1, 2, and 3 development rock (bedrock). If known the document would benefit from some explanation. Regardless, the project should conduct ABA testing for materials (static) and humidity cells (kinetic) for waste materials based on the expected proportion of Geochem rock types in the waste materials to inform the EIS analysis. The testing should be representative and meet the expected guidance documents. The humidity cell tests should run for sufficient time such that a stable release rate is achieved. Following the assessment static and kinetic data by geochemical rock type, affective NPR (critical NPR) for the project should be established with the assessment of the time to onset of acidity.</p> <p>Requested Action: Consider comment and edit text as needed. Future discussion item in development of the Draft Scoping Decision Document.</p>	<p>A Materials Characterization Program is underway and includes a full suite of static and kinetic test methods. The Program is conducted with detailed and regular review by the DNR Lands and Minerals Division staff. A comprehensive data set is being collected from representative samples of development rock. Geochemical characterization of development rock will be available for the EIS. Text has been updated in Section 6 Overburden, Development Rock, and Backfill Materials Management.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
408	6.b	1112				<p>The EIS would likely require description of the geologic components of the bedrock to be excavated during development of the mine. Example: units including serpentinite rock often contain Federally hazardous levels of Nickel and Chromium. It is likely a plan for sampling, analysis, waste disposal of overburden and ore would be needed for the EIS. Additional considerations may include provisions for worker protection.</p> <p>Requested Action: Advisory only. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved at this stage. Topic will be addressed during EIS as necessary.</p> <p>Requested Action: None.</p>
409	6.b	1112				<p>RGU notes that mafic and ultramafic rock types often contain elongate minerals, including asbestiform amphiboles and chrysotile. Background data needs for the EIS would likely include sampling and analysis results for elongate minerals. In terms of regulatory requirements if elongate minerals are present, OSHA and MSHA require worker protection and mitigations to prevent inhalation & ingestion, transport of dusts on soiled clothing, and aerial transport of dust off-Site (beyond project fence line).</p> <p>Requested Action: Advisory only. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved at this stage. Topic will be addressed during EIS as necessary.</p> <p>Requested Action: None.</p>
410	6.b	1112				<p>The EIS would likely require a thorough analysis of source rock for the purposes of assessment, characterization and quantification of elongate mineral particles. Analysis of potential impacts would require the results and original laboratory data including elemental composition, crystal structure, and growth habit.</p> <p>Requested Action: Advisory only. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved at this stage. Topic will be addressed during EIS as necessary.</p> <p>Requested Action: None.</p>

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411	11.a	1112				<p>This indicates sulfide is mixed with the nickel-copper-cobalt. It should be addressed how the sulfide would be handled when these minerals are removed.</p> <p>Requested Action: Consider comment; edit text as warranted. Future discussion topic in development of Draft Scoping Decision Document</p>	<p>Nickel-copper-cobalt will be separated from sulfur in the Talon Battery Materials Processing Project in North Dakota. Talon will be scoping the permitting process for North Dakota in conjunction with the North Dakota Department of Environmental Quality (DEQ) and applicable federal agencies. The North Dakota project is also undergoing a federal NEPA environmental review process in line with requirements associated with the Department of Energy grant for development of the facility</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
412	11.a	1112				<p>If the cobalt, platinum, palladium, and gold will be extracted from the ore that needs to be indicated in the project description.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Please see Response to Comment #35.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
413	11.a	1118				<p>What is the proportion of each of the three basic types of mineralization in the TIC?</p> <p>Requested Action: Answer question. Edit text as necessary</p>	<p>Is this question intended to be for the TIC or for the Tamarack Mining Project?</p> <p>The TIC is a large body that contains many geological occurrences of mineralization across a large area. Only the mineralization within the Tamarack Mining Project has been evaluated to a level where proportions of ore types can be estimated.</p>	<p>Follow-up: What is the proportion of each of the three basic types of mineralization in the Tamarack Mining Project area?</p> <p>Requested Action: Answer question and update EAW as necessary.</p>
414	11.a	1121				<p>Because of the mercury impairments at Big Sandy Lake it is important to know how the peat removed from the surface of the project area will be managed to prevent additional mercury from entering the watershed particularly because there is a peat harvesting operation nearby.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
415	11.a	1123				<p>The submittal does not identify the location of fractures, joints, fissures, and faults. This detailed information will be needed to assess impacts in the EIS</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
416	11.b	1140				<p>The section indicates over 50% of the project is peat or muck soils. Information regarding the depth of organic soils is absent and should be provided</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Studies are planned or are underway to understand depths of organic soils in the Project Area. The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
417	11.b	1140		10		<p>Recommend using a different color for the Soil Unit as the green blends with the background.</p> <p>Requested Action: Review for accessibility; modify figure if needed</p>	<p>Soil unit colors have been updated on Figure 10 Soils.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
418	11.b	1143				<p>What is the volume and acreage of peat and much that would be removed for building the site?</p> <p>Requested Action: Answer question. Edit text as necessary</p>	<p>Studies are planned or underway to determine the amount of peat that would be removed for construction of the surface facilities. The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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419	11.b	1145				It would be helpful to indicate the percent of peatlands in the project area Requested Action: Address comment; modify text as warranted.	Studies are planned or underway to determine the percentage of peatland in the Project Area. The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.
420	11.b	1149				Please indicate the percentage of peatlands in the project area. (Note that this question also addresses part of 571 and 572) Requested Action: Consider comment; edit text as warranted.	Studies are planned or underway to determine the percentage of peatland in the Project Area. The Project will address this question, as necessary, in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
421	11.b	1150				The description of impacts to hydric soils, particularly due to the railroad spur construction, is insufficient. Requested Action: Consider comment; edit text as warranted.	Comment is noted. The Project will address this question, as necessary, in the EIS.	Resolved at this stage. Topic will be addressed during EIS as necessary. Requested Action: None.
422	11.b	1150				Underground mining techniques are stated to minimize impacts to soils. However, no explanation is provided as to how or to what extent impacts would be minimized. The use of the word "minimize" rather than "avoid" also suggests that there would still be impacts. Peat accumulating wetlands are extremely sensitive to hydrologic changes and topographic changes (i.e. subsidence). Detailed explanation of how impacts would be avoided or minimized is justified. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Additional text has been added to "Orebody Access" in Section 6 on strategies to minimize impact to soils and overburden by proposing a TBM for the Decline development. Also see Response to Comment #87 and Line 466 – 470 regarding ground settlement and crown pillar deflection.	Resolved. Requested Action: None.
423	11.b	1159	10			These numbers do not indicate if potential remediation of peat soils would require additional excavation. This potential should be considered in excavation estimates. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
424	12.a.i	1170				The potential impacts resulting from changes to surface water flows should be evaluated in the EIS. Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted.	Resolved. Requested Action: None.
425	12.a.i	1170				Will there be in-field delineations of floodplains in addition to the FEMA-delineated floodplains? Requested Action: Answer question.	The need for additional floodplain delineation will be considered when developing the technical approach that will support the Project's EIS data submission.	Forward verbatim. Requested Action: None.
426	12.a.i	1180				Provide additional detail and clarification with regard to general surface water from the project area in particular as it pertains to the Tamarack River and Mud Lake watersheds. Requested Action: Answer question and update EAW as appropriate.	Text updated in the EAW.	Resolved. Requested Action: None.
427	12.a.i	1183				Instead of stating that there are no public waters basins located within one mile of the project area, provide the distances from the project for the Tamarack River, Minnewawa Creek, Sandy River, Tamarack Lake and Big Sandy Lake.	Distances from the Project Area to Tamarack River, Minnewawa Creek, Sandy River, Tamarack Lake and Big Sandy Lake are illustrated on Figure 11.	Resolved. Requested Action: None.

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						Requested Action: Answer question and update EAW as appropriate.		
428	12.a.i	1183				<p>It is not clear if "public water basins" indicates mapped basins of the Public Waters Inventory, or mapped basins plus potential public waters that meet the definition of Minnesota Statute 103G.005, Subdivision 15a but may be unmapped. This distinction should be clarified.</p> <p>Requested Action: Answer question and update EAW as appropriate.</p>	<p>The "public water basins" referenced in the text, tables, and figures indicate mapped basins of the Public Waters Inventory and do not include potential public waters that meet the definition of Minnesota Statute 103G.005 but are unmapped. Link to statute: https://www.revisor.mn.gov/statutes/cite/103G.005</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
429	12.a.i	1187				<p>Only public waters with wild rice are listed. Have field surveys been completed to determine additional wild rice habitat downstream of project area (and therefore receiving project discharge)?</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
430	12.a.i	1187				<p>How will the protection of the wild rice waters be ensured & are relevant tribal governments or stakeholders being consulted for their input?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Tribal Governments have been, and will continue to be, consulted regarding wild rice.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
431	12.a.i	1188				<p>These lakes are also now listed at the MPCA as waters used for the production of wild rice and the 10 mg/L sulfate standard would apply to the lakes.</p> <p>Requested Action: Regulatory guidance. Future discussion item.</p>	<p>Comment is noted.</p> <p>The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
432	12.a.i	1196	11			<p>Round Lake (WID = 01-0023-00) should also be listed as a water used for the production of wild rice</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>Round Lake (WID = 01-0023-00) is not listed in Minnesota's Wild Rice Waters inventory as compiled by the DNR as part of the 2008 report "Natural Wild Rice" submitted to the Legislator. The Project used publicly available data for this EAW data submittal.</p> <p>https://files.dnr.state.mn.us/fish_wildlife/wildlife/wildrice/statewide-inventory-wild-rice-waters.pdf</p>	<p>Follow Up: Use most up to date wild rice waters and update the EAW as appropriate. The MPCA recently issued an updated impaired waters list which should be referenced.</p> <p>Requested Action: Make changes with available updates; advisory for future iterations.</p>
433	12.a.i	1196	11			<p>State shoreline classifications and standards are the minimum that must be followed; the LGU can adopt stricter standards and classes. LGU standards for lakeshore classifications and standards must be determined and met. Recommend providing those in the document.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Aitkin County Shoreland Ordinance (amended 2017) was acknowledged and the EAW updated.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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434	12.a.i	1221				<p>What reference was used to determine public waters?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Reference updated in the EAW from Reference #25 to Reference #21: Minnesota Department of Natural Resources. Public Waters Inventory (PWI) Maps.</p> <p>https://www.dnr.state.mn.us/waters/watermgmt_section/pwi/maps.html.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
435	12.a.i	1250				<p>A hydrologic and hydraulic model that incorporates updated precipitation information (e.g., Atlas-14) should be used to evaluate where the floodplain would be. Impacts of the proposed project should be evaluated relative to these simulated floodplain elevations.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>The Project will consider using both site specific and publicly available climate data for floodplain evaluations. The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
436	6.b	1255				<p>Back in Item 6b, Line 519, the TBM is expected to cross from the overburden to bedrock containing elevated sulfur. The potential release of elevated sulfur from the bedrock to surrounding waters (including those supporting wild rice) is a concern. It is also a concern if any aspect of the project results in releases of sulfur dioxide (SO₂) that could also adversely affect wild rice resources. The EIS would likely require the conceptual model to be capable of addressing this potential flow path and assess potential water quality impacts to surface waters.</p> <p>Requested Action: Advisory only. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.</p>	<p>Comment is noted.</p> <p>All water produced by the TBM will be collected and treated prior to discharge. Specifically, sulfur dioxide (SO₂) is not anticipated to be released as part of the TBM tunneling process as it is a combustion gas. The TBM relies on mechanical means of breaking break rock (not blasting), thus the means of generating sulfur dioxide during this process is not anticipated.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
437	12.a.i	1255				<p>Provide more complete description of surface water flow and surface water quality monitoring efforts. Currently, the information is insufficient to determine whether current efforts will adequately inform EIS.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
438	12.a.i	1255				<p>How would potential negative impacts to surface water quality or quantity be assessed and remediated if they occurred?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
439	12.a.i	1255				<p>The stormwater management plan for the project should be based on a hydrologic and hydraulic model that allows for simulations of both design events (i.e., 100-year, 24-hour rainfall event) and continuous simulations in order to assess the potential impacts to downstream waterbodies under existing and future conditions. This information should be provided in order to assess impacts to surface water and natural resources.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be addressed in the EIS</p> <p>Requested Action: None.</p>
440	12.a.i	1255				<p>How often is monitoring occurring and at what locations? What parameters are being monitored?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>For this data submittal the Project is only making use of publicly available data, which the Project feels this is sufficient for scoping. The Project will address, as necessary, this issue in the EIS.</p>	<p>While the information presented is in the public domain, we respectfully request document more clearly indicates the information is in publicly available data and also addresses the original comment: How often monitoring is occurring, what locations, and parameters</p>

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								monitored. Requested Action: Modify text to address comment.
441	12.a.i	1255				Will monitoring of surface water flow and quality be of the same, or similar, frequency during mine operation? Requested Action: Answer question.	Comment is noted. Required monitoring during operations will be determined as part of the Environmental Review and/or Permitting stages of the project.	Resolved. Requested Action: None.
442	12.a.i	1255				Provide the locations of all surface water monitoring sites and flow measurements collected at the sites as well as manual flow measurements, logger data and rating curves for the purpose of reviewing flow measurements. Additional stream flow monitoring locations may be recommended if it is determined that more measurements are needed to adequately characterize baseline surface water flows. Requested Action: Address comment and update EAW as appropriate.	See Response to Comment #440.	Forward verbatim. Requested Action: Modify text to address comment.
443	12.a.i	1255				It is recommended that the conceptual surface water flow model be discussed with the DNR prior to constructing the quantitative models that will be used to estimate the effects of the project on water resources. Changes may need to be made to the conceptual model depending on the outcome of the discussion(s). Requested Action: Regulatory guidance. Consult DNR Lands and Minerals regarding potential groundwater models.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Forward verbatim. Requested Action: Advisory.
444	12.a.i	1255				Provide figures showing surface water baseline conditions. It would be helpful to display variations in streamflow over time using time series plots (hydrographs), as well as graphs displaying surface water quality in ditches, streams, and lakes. Requested Action: Future discussion item.	Comment is noted. Surface water baseline conditions, including streamflow variations at multiple station, hydrographs and water quality will be provided, as necessary, as part of the EIS data submission.	Forward verbatim. Requested Action: Add text to address comment.
445	12.a.i	1255				Does Talon propose to include a quantitative water model to simulate contact water management, industrial stormwater management, and construction stormwater? If yes, the SEAW should identify the type of simulation software and what conditions would be modeled. Requested Action: Answer question.	Comment is noted. Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
446	12.a.i	1255				For quantitative surface water hydrology modeling, what software program would be used to simulate runoff (if necessary)? The modeling should specify exactly where and how precipitation falling on the project features may be released back into natural systems, including during the reclamation and closure phases. Requested Action: Answer question.	Comment is noted. Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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447	12.a.i	1255				Does Talon propose to tailor the water model to address different potential operating conditions (full operation; partial shutdown; temporary idle; or similar)? Requested Action: Answer question.	Comment is noted. Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
448	12.a.i	1255				Does Talon propose to specify the potential pathways for how industrial stormwater, contact water, or leakage from other project features that could be released to surface waters and quantified? Requested Action: Answer question.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
449	12.a.i	1255				Does Talon propose to develop a water mass balance model for the project? Requested Action: Answer question.	Comment noted. Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
450	13.a.i	1255				Does Talon propose to develop a LiDAR assessment of current topology to describe current conditions, with an elevation model of the final topography after reclamation, to support analysis of potential hydrological change? Requested Action: Answer question.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Not resolved. Requested Action: Answer questions from original comment.
451	14.a.i	1255				The document notes that evaluations will be conducted...to estimate potential effects...on water resources. Does Talon propose the waterbodies listed in Tables 11 and 12 as constituting the complete list of waterbodies to be evaluated? Any other waters to be evaluated? Requested Action: Answer question.	Comment is noted. The project did not reference Table 11 or Table 12 in line 1259 or its paragraph. Water bodies that would need to be evaluated will be determined during the DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
452	12.a.i	1257				Provide more details on the surface water flow conceptual model in the next data submittal. The EAW currently lacks any discussion of conceptual modelling, for example listing sources, pathways and receptors so as to ground numerical modeling. A review of the water management strategies on site cannot be completed without this critical information. Requested Action: Address comment and update EAW as appropriate. Future discussion necessary.	Comment is noted. The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. A review of the water management strategies will be part of the EIS process.	Forward verbatim. Requested Action: Expand Figure as requested.
453	12.a.i	1258				Water quality modelling is also required for contingency planning for MLARD source terms and mitigation planning. This must trace sources, treatment options, source control strategies and discharges to the receiving environment. Water quality modeling should include base case as well as upper case source terms for MLARD planning purposes. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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454	12.a.i	1261				<p>The type of wetland delineation (Level 1 or Level 2) is not specified. This information is needed to determine level of detail and if finer resolution is warranted.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>A Level 3 Wetland delineation was submitted to the agencies in 2023.</p> <p>Level 3 "intensive site assessment and uses intensive research-derived, multi-metric indices such as the Hydrogeomorphic Approach or Biological Assessments. They are meant to give detailed information regarding how well a wetland is functioning."</p> <p>The EAW was updated to reflect this.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
455	12.a.i	1261				<p>There is inconsistent use of project acreage and project acreage impacts. Here the EA states there are approximately 302 acres of wetland present within the Project Area, earlier the project area was considered either 224.9 or 263.3 acres, of which not all was considered wetlands?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>As explained in the EAW data submittal and Table 3: Summary of Acreage Types within Project Area (added during the amending):</p> <p>"The project area is defined by the surface boundary and the underground boundary areas, as shown on Figure 2, and together comprise 447.0 acres."</p> <p>"The underground boundary area is the area in which mining would occur below the surface and encompasses approximately 224.9 acres and overlaps with the surface boundary area by approximately 41.2 acres."</p> <p>"The surface boundary area encompasses approximately 263.3 acres and includes the following:"</p> <p>The 302.2 acres of "Wetlands and shallow lakes" is within the Project Area of 447.0 acres.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action:</p>
456	12.a.i	1261				<p>Information must be provided on methods and considerations for determining the Project Area. Additional wetland delineation may be necessary to determine the potential for indirect wetland impacts.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>How the Project Area is defined is described in the EAW data submittal lines 191 and 192. The potential area of indirect wetland impact will be determined, as necessary, in the EIs.</p>	<p>Resolved at this stage. To be addressed in the EIS</p> <p>Requested Action: None.</p>
457	12.a.i	1263		14		<p>The wetland delineation was conducted in growing season 2022 but no submission date to the agencies is provided. Agency review timelines should be adequate to provide boundary and type review within this timeframe. Given the large quantity of wetlands present on site, an approved Level 2 wetland delineation is critical to assessing potential wetland impacts. Figure 14 appears to illustrate NWI wetland boundaries but it is not clear if they are NWI or delineation boundaries.</p> <p>Requested Action: Answer question regarding wetland boundaries in Figure 14.</p>	<p>The EAW data submittal was updated with the date that the wetland delineation was submitted to the agencies. Figure 14 shows the Level 3 Wetland Delineation conducted by GEI during the 2022 growing season as well as the NWI wetland boundaries that are outside of the Level 3 delineated area. Figure 14 will be updated to reflect this more clearly.</p>	<p>Resolved.</p> <p>Requested Action:</p>
458	12.a.i	1264				<p>Text indicates that wetland delineations are considered preliminary until TEP review. Wetland delineations are preliminary until DNR, as the WCA approving authority, makes a decision on a wetland delineation.</p>	<p>Comment is noted.</p> <p>The Project will participate in future discussions on this subject as part of the DSDD process.</p>	<p>Resolved at this stage. To be addressed in the EIS</p> <p>Requested Action: None.</p>

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						Requested Action: Advisory. Regulatory guidance. Future discussion item.		
459	12.a.i	1266				Wetland categories found in project area are listed, but water quality and discharge volume impacts cannot be assessed without knowing more about water sources for different wetlands. Basic water quality data such as pH and conductivity would be useful for initial review of subsequent wetland impacts subsection in item 12. Requested Action: Future discussion item.	Comment is noted. Data collected in the wetlands and the associated analyses will be provided in the EIS data submittal.	Resolved at this stage. To be addressed in the EIS Requested Action: None.
460	12.a.i	1266		14		The color chosen to represent the "National Wetlands Inventory" (NWI) is very faint. Choose a color that is more visible. Requested Action: Address comment and update Figure 14 as appropriate.	Figure 14 has been updated to improve color contrast for the NWI.	Resolved. Requested Action: None.
461	12.a.i	1269				Ditching in wetlands is a past impact that is now reflected in the current hydrologic behavior of the ditched wetland system. This will need to be accounted for in the assessment of project-specific impacts to these previously-impacted systems. Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted.	Resolved at this stage. To be addressed in the EIS Requested Action: None.
462	6.b	1272				RGU notes it will be necessary to describe potential groundwater flow impacts resulting from peat excavation. Requested Action: Consider comment; provide additional detail on what is currently known. The issue will have to be addressed in the Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
463	12.a.i	1272				More information needed on monitoring and additional information on the types of models that will be used Requested Action: Address comment and update EAW as appropriate.	Comment is noted.	Resolved. Requested Action: None.
464	12.a.i	1272				Provide more complete description of wetland water level and water quality monitoring efforts. Insufficient information to determine whether current efforts will adequately inform EIS. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
465	12.a.i	1272				Further detail of wetland water level and water quality monitoring methods is warranted. No details are provided other than that data is being collected. Some knowledge of methods is needed to assess potential scoping needs. Further, floristic quality monitoring should be considered given the potential of large peatland complexes and adjacent wetlands to harbor high quality plant communities and rare species. Hydrogeomorphic classification and corresponding functions should also be considered to further assess potential impacts.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.

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						Requested Action: Future discussion item.		
466	12.a.i	1272				Will monitoring of wetlands be of the same, increased, or similar frequency during mine operation? Requested Action: Answer question.	Comment is noted. Required monitoring during operations will be determined in due process as part of the Environmental Review and Permitting stages of the project.	Resolved. Requested Action: None.
467	12.a.i	1272				How would potential negative impacts to the wetlands be assessed and remediated if they occurred? Requested Action: Answer question.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.
468	12.a.i	1272				Provide a summary of the wetlands water quality data collected to date, along with a map identifying the locations of the monitoring stations. It is unclear from the EIS into which wetland(s) the mine plans to discharge effluent into. Providing baseline water quality/water flow and seasonal variation of each will assist in appropriate discharge planning and identify any potential effects to surface water as a result of wastewater discharges. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. For the EAW data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping. The project will address, as necessary, this issue in the EIS. This Comment also refers to the EIS. The Project has not submitted an EIS data submittal, but an EAW data submittal for scoping the EIS. Refer to Figure 5 and Lines 7-5 - 718 in the EAW for details regarding proposed discharge location.	Resolved. Requested Action: None.
469	12.a.i	1272				Provide the locations of all wetland monitoring wells and baseline wetland monitoring data. Additional wetland monitoring wells may be recommended if it is determined that more wells are needed to adequately characterize wetland hydrology. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. For the EAW data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping. The project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
470	12.a.i	1272				It is recommended that the conceptual wetland hydrology model be discussed with the DNR prior to constructing the quantitative models that will be use to estimate the effects of the project on water resources. Changes may need to be made to the conceptual model depending on the outcome of the discussion(s). Requested Action: Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Forward verbatim. Requested Action: Advisory. To be discussed in development of SEAW/DSDD.
471	12.a.i	1272				It is recommended that the quantitative wetland hydrology models that will be used to estimate the effects of the project on wetlands be discussed with the DNR prior to the start of modeling. Requested Action: Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Forward verbatim. Requested Action: Advisory. To be discussed in development of SEAW/DSDD.

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472	12.a.i	1272		15		<p>Wetland hydrology monitoring should include measurement of vertical gradients between the wetland and underlying aquifers to evaluate hydrologic connections between the wetlands and aquifers to be affected by mining.</p> <p>Are the monitoring wells referred to in this paragraph shown on Figure 15?</p> <p>Requested Action: Future discussion item. Answer question concerning monitoring well locations.</p>	<p>Figure 15 only shows wells and borings that are listed in the Minnesota Well Index. Figure 15 including the legend was updated to reflect this. Figure 15 also differentiates between Project and non-Project owned installations registered with the MDH. Comment is noted. The Project will address, as necessary this issue in the EIS.</p>	<p>Resolved at this stage. To be addressed in the EIS</p> <p>Requested Action: None.</p>
473	12.a.ii	1282				<p>The EAW states, "One well is completed in a Quaternary undifferentiated aquifer and no information is available for three wells." Will the EIS evaluate potential interference with water supply wells?</p> <p>Requested Action: No action necessary. Comment refers to existing MWI wells.</p>	<p>Comment is noted.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
474	12.a.ii	1282		15		<p>The EAW states, "Monitoring wells have been installed in and around the Project Area (Figure 15) to characterize baseline groundwater conditions (groundwater levels and groundwater quality)." How were the location of these monitoring wells determined?</p> <p>Requested Action: Provide additional information on monitoring well network as it relates to baseline conditions and conceptual models that will be presented in the EIS.</p>	<p>The design of the monitoring network considered but was not limited to the proposed mine plan, geology, structural geology and hydrogeology, groundwater flow directions, surface water bodies and spatial distribution (both lateral and vertical). The Project will address this question, as necessary, in the EIS.</p>	<p>Forward verbatim.</p> <p>Requested Action: None.</p>
475	12.a.ii	1282				<p>Although there are no mapped springs near the project area, the possibility exists for artesian springs to be present across this wetland-dominated landscape. Does the proposed hydrologic characterization program account for this possibility, and if yes, how is this proposed to be done? If not, conducting surveys for springs may be needed as part of the hydrologic characterization to address this potential concern.</p> <p>Requested Action: Answer the question; edit document as needed. Possibly a future discussion item to specify what additional field surveys for springs may need to be conducted as part of the baseline hydrological characterization.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be addressed in the EIS</p> <p>Requested Action: None.</p>
476	12.a.ii	1282				<p>"Johnson's Beaver Pond", identified within the MN Spring Inventory, may be within 20 miles.</p> <p>Requested Action: Note comment.</p>	<p>Comment is noted.</p> <p>Johnson's Beaver Pond will be examined for proximity with respect to this statement. A preliminary examination of Johnson's Beaver Pond indicates that it is outside the 20-mile radius from the geometric centroid of the site surface facilities.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
477	6.b	1290				<p>Assessment of potential impacts to drinking water wells should include the TBM.</p> <p>Requested Action: Consider comment; edit text as needed.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
478	12.a.ii	1290		15		<p>Plans to monitor surrounding water supply wells during mine dewatering should be discussed.</p> <p>Requested Action: DNR will evaluate available information</p>	<p>Comment is noted.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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						during the development of the Scoping EAW to determine the treatment in the EIS.		
479	12.a.ii	1290		15		<p>Are piezometers part of the monitoring well network?</p> <p>Requested Action: Answer question and update EAW as appropriate.</p>	<p>The Piezometers were erroneously included in Figure 15 as they are less than 15 ft in depth and not registered in the Minnesota Well Index. Figure 15 illustrates wells and borings registered in the Minnesota Well Index only, this includes wells > 15 ft in depth, vibrating wire piezometer installations and exploration borings.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
480	12.a.ii	1290				<p>Modeling of the impact of mine dewatering and appropriations on the artesian sand and gravel aquifers used by water supply wells near the project area should be submitted. The same is true for impacts to wetland hydrology.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be addressed in the EIS</p> <p>Requested Action: None.</p>
481	12.a.ii	1305		15		<p>Only one quaternary monitoring well (22TKW059) is near the underground workings and south of the minor watershed boundary. The next nearest well south of the minor watershed boundary is approximately a mile south (22TKW060). There are no shallow bedrock monitoring wells south of the minor watershed boundary. While a minor watershed boundary may not significantly affect groundwater flow, there is reason to need evaluation of whether there is a groundwater divide. This is important for understanding groundwater flow direction. The nearest multi-level upgradient wells (08TKW005, 21TKW0022, etc.) are ~4,000 feet away from the next downgradient locations (i.e., the "Inset 3" and "Inset 2" wells) in the approximate surface projection of underground workings. Groundwater flow is believed to be generally west, so the nearest multi-interval and upgradient wells (08TKW005, 21TKW0022, etc.) might not even be true upgradient wells; a flow line from those wells could conceivably bypass the surface projection of underground workings area, especially when there is a distance of thousands of feet between well locations. As noted in EAW Figure 15, and starting on Line 1290, there are water supply wells near and downgradient of the underground workings.</p> <p>Requested Action: Regulatory guidance. Future discussion item.</p>	<p>Comment is noted.</p> <p>Not all Project wells are shown on Figure 15 because either 1) they are less than 15 feet in total depth and not required to be registered with the MDH, or 2) are outside of the 1 mile radius.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
482	12.a.ii	1305				<p>To evaluate the adequacy of the monitoring well network, boring logs, monitoring well construction reports (including surveyed elevations), data collected (parameters and monitoring period) for each monitoring well should be included.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
483	12.a.ii	1305				<p>It will be important for well locations to be representative of the area of potential affect and the scope not to be too narrowly focused on just the project site. Will the current distribution of monitoring wells proposed be able to determine impacts outside the Mississippi watershed if it were to occur?</p>	<p>Comment is noted.</p> <p>Please provide more detail on this Comment.</p>	<p>Forward verbatim.</p> <p>Requested Action: Answer question; modify text as warranted.</p>

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						Requested Action: Answer question and update EAW as appropriate.		
484	12.a.ii	1305				Are existing monitoring wells completed in the same aquifer(s) as nearby water wells? Requested Action: Answer question.	Comment is noted. For this data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping.	Forward verbatim. Requested Action: Add text to address comment.
485	12.a.ii	1305				Identify plans for sealing any existing water-supply/monitoring wells and exploratory borings located within the footprint of the mine project by a licensed well contractor. MDH Well Management Section can be contacted for questions. Requested Action: Regulatory guidance. Provide discussion of well and boring abandonment procedures in EAW as appropriate.	All applicable wells and borings will be sealed in accordance with Minnesota Rules Chapters 4725 and 4727 and Minnesota Statutes Chapter 103I.	Forward verbatim. Requested Action: Add text to address comment.
486	12.a.ii	1305				Well construction logs, stratigraphy reports, monitoring details and monitoring data for all monitoring wells installed in and around the project site should be provided. Additional monitoring wells may be recommended if it is determined that the current monitoring well network does not adequately characterize the hydrologic conditions at the mine site. Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.
487	12.a.ii	1305				To better understand existing conditions, the following figures would be helpful: horizontal and vertical hydraulic gradients in the surficial and bedrock aquifers using cross sections and/or potentiometric surface maps; groundwater level variations over time displayed using time series plots (hydrographs); graphs displaying groundwater quality in both bedrock and surficial aquifers. Requested Action: Provide requested figures.	Comment is noted. For this data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
488	12.a.ii	1305				When available, provide information from all pumping tests, slug tests, or any other tests performed to evaluate aquifer properties. Additional testing may be recommended if it is determined more information is needed to adequately characterize the hydrologic conditions at the mine site. Requested Action: Future discussion item.	Comment is noted. The Project will provide hydraulic testing results as part of the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.
489	12.a.ii	1305		15		A separate figure showing the locations of the monitoring wells and bore holes that are currently being used to monitor groundwater levels should be provided. The monitoring wells should be separated into bedrock and surficial wells in the figure or be provided in separate figures. Wells in the figure(s) should be labeled so they can be correlated with groundwater monitoring data. Requested Action: Provide requested figures.	Comment is noted. For this data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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490	12.a.ii	1305		15		<p>The number and locations of the existing monitoring wells may not be adequate to formulate a comprehensive site conceptual model. Wells seem to be concentrated in the northern half within the project area. There are only 5 monitoring wells outside the project area boundary. There are no monitoring wells south of the project area. Information to be obtained from monitoring wells is not stated.</p> <p>Requested Action: Provide additional information on monitoring well network as it relates to baseline conditions and conceptual models that will be presented in the EIS.</p>	<p>Comment is noted.</p> <p>For this data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
491	12.a.ii	1305				<p>Does Talon propose development of two conceptual models to assess impacts to groundwater? One conceptual model could be used to model current conditions while the second could be used to model future conditions, including into reclamation and closure.</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
492	12.a.ii	1305				<p>Does Talon propose to rely on a finite-difference numerical groundwater flow model to assess impacts? Would this model be coupled with other analytical or analog models to answer specific questions for the project area?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
493	12.a.ii	1305				<p>Does Talon propose for the numerical models to be capable of assessing changes to the groundwater systems predicted from initial mine construction, underground mine operations, or other project elements that could affect aquifer recharge?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
494	12.a.ii	1305				<p>Does Talon propose to configure the groundwater impact models so that the results can be used in the surface water and wetland impact assessments?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
495	12.a.ii	1305				<p>Does Talon propose for groundwater modeling to assess project-related groundwater depressurization effects during operations?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
496	12.a.ii	1305				<p>Has Talon identified potential pathways for how contact water or industrial groundwater could be released to groundwater?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>The Project assumes the phrase "industrial groundwater" to be industrial stormwater as defined in Line 610 - 612, please confirm. The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
497	12.a.ii	1305				<p>Does Talon propose to model potential changes to deeper bedrock groundwater quality as the project transitions from underground operations to reclamation and closure? Potential issues could be flow from the flooded underground mine workings in closure or groundwater interaction with the cemented rock backfill.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

Comment No.	EAW Section	EAW v1 Starting Line No.	Table	Figure	Graphic	Round 1 Comment and RGU Requested Action 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Requested Action 2/5/2024
						Requested Action: Answer question.		
498	12.a.ii	1305				Does Talon propose to assign a pathway for any potential precipitation to infiltrate roadways and any subsequent impacts to groundwater quality? Requested Action: Answer question.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
499	12.a.ii	1307				The DNR requests the opportunity to review and discuss the conceptual groundwater model prior to constructing the quantitative groundwater models that will be used to estimate the effects of the project on water resources. Changes may need to be made to the conceptual model depending on the outcome of the discussion(s). The DNR also requests the opportunity to discuss the quantitative groundwater models that will be used to estimate the effects of the project on water resources. This will help ensure that the DNR agrees they will adequately predict all impacts to water resources from the project. Requested Action: Regulatory guidance. Consult DNR Lands and Minerals regarding potential groundwater models.	Comment noted.	Resolved at this stage. To be addressed in the EIS Requested Action: None.
500	12.a.ii	1308				As stated, quantitative modeling will include groundwater and particle tracking (Line 2064). As additional information relating to aquifer and bedrock hydraulic properties will gradually become available as the mining drifts and stopes advance, A plan should be in place to: (i) perform bounding analysis for the EIS and (ii) update the model during the mine operation to confirm the bounding analysis and to guide mining operations, if necessary. If the infiltrating water includes potential contaminants, the modeling plan should include the development of a transport model to assess the mixing between the infiltrating water and ambient groundwater. Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.
501	12.a.ii	1309				What type of quantitative groundwater flow models will be constructed and will they be sufficient enough to model changes in groundwater flow direction and/or contaminant transport, as well as potential impacts to nearby surface waters & wetlands, as a result of mining activities? Will all models, modeling software and data, and inputs to the model be available for MDH staff so it can be verified and replicated? Requested Action: Answer question and update EAW as appropriate.	As part of the EIS data submittal the applicable models, modeling software and data, and inputs to the water resources models will be made available.	Resolved. Requested Action: None.
502	12.a.ii	1312				Depth to groundwater should be mapped in a figure with the proposed project features overlain for clarity. Requested Action: Provide requested figure.	Figure 16 has been updated to include the proposed project features.	Resolved. Requested Action: None.

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503	12.a.ii	1312		16		<p>Site specific monitoring well data should be used to characterize the depth to water in the project area rather than general NRCS soils information.</p> <p>Requested Action: Update EAW with depth to groundwater information from monitoring well network.</p>	<p>Comment is noted.</p> <p>For this data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Forward verbatim.</p> <p>Requested Action: Modify text to address comment.</p>
504	12.b.i	1333				<p>The EAW states that "Significant additional hydrological data has been collected since 2020." Will additional modeling be completed to determine inflow? A new model is needed.</p> <p>Requested Action: Answer question with additional detail if known. Future discussion item in development of Draft Scoping Decision Document.</p>	<p>Additional modeling will be performed to include all relevant data collected since 2020 to support and inform the EIS data submission.</p>	<p>Forward verbatim.</p> <p>Requested Action: None.</p>
505	12.b.i	1333				<p>RGU notes the summary regarding discharges from the water treatment plant and sanitary water treatment plant is not at the level of detail required to assess potential impacts to aquatic species. The EIS will require detailed information for these project components.</p> <p>Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.</p>	<p>Comment is noted.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
506	12.b.i	1333				<p>The EAW states, "Generally, a stream can adapt to an increase in flow that is up to 20% above its channel forming flow (defined as the 1.5-year recurrence flood flow)." Was there any analysis completed for the ditch system, Tamarack River, and Prairie River that will be receiving the treated waters? What happens if the flow increases naturally due to flooding due to climate change?</p> <p>Requested Action: Answer questions and update EAW as appropriate.</p>	<p>Further evaluation of the public drainage system and the river system would be conducted for the EIS data submittal and would include consideration of climate change.</p>	<p>Forward verbatim.</p> <p>Requested Action: None.</p>
507	12.b.i	1333				<p>The EAW states, "Therefore, this preliminary assessment indicates that potential impacts due to increased flow from the Project discharge could be controlled by permit conditions of a future NPDES/SDS permit and water appropriations permit." What were the preliminary assessment figures? What were the estimated discharge volume per day?</p> <p>Requested Action: Answer questions and update EAW as appropriate.</p>	<p>Refer to lines 1373-1378 for preliminary results of the ditch capacity work completed and to lines 1352-1367 contains initial high-level estimates for expected discharge volumes. The Project discharge consists of discharges from the Contact Water Treatment Plant and the Sanitary Water Treatment Plant. Preliminary estimates of discharge rates for the Contact Water Treatment Plant are 840-1640 gpm (EAW data submittal line 1361), and for the Sanitary Water Treatment Plant are 7 gpm on average with a peak of 100 gpm (EAW data submittal lines 1365-1366). In total, these combined flows total 1.2 to 2.5 million gallons per day (MGD). These preliminary estimates will be updated with additional data and modeling and provided a with the EIS data submittal.</p>	<p>Forward verbatim.</p> <p>Requested Action: None.</p>
508	12.b.i	1333				<p>The EAW states, "Current Minnesota climate trends and anticipated climate change in the general location of the Project are not expected to influence how a discharge of</p>	<p>Comment is noted.</p>	<p>Forward verbatim.</p> <p>Requested Action: None.</p>

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						treated water would affect water resources." Provide modeling/data to support this conclusion. Requested Action: Future discussion item.	Future discussion item, as necessary, in development of DSDD.	
509	12.b.i	1333				The EAW states, "The EIS will provide additional information on the potential influence of current climate trends and anticipated climate change on potential Project effects on water resources." The EIS should evaluate how the project will exacerbate existing climate changed induced stressors. Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
510	12.b.i	1333				Talon says, "Additional evaluation of potential effects associated with the flow increase from the water treatment plant discharge and sanitary water treatment plant discharge will be addressed in the EIS." In the EAW, they should describe impacts on all native species in the stream and on those that use the stream for any purpose. Requested Action: Comment noted. This Section of EAW specifically requests information on impacts to surface and groundwater, not fish and wildlife.	Comment is noted. As note in the 'Requested Action by RGU' comment, "This Section of EAW specifically requests information on impacts to surface and groundwater, not fish and wildlife." Furthermore, impacts evaluation, such as what is requested here, are not within the domain of the EAW.	0 Requested Action: None.
511	12.b.i	1335				EAW item 12.b.i.3 requests information on effects to surface or groundwater from wastewater discharges; however, the response provided defers any discussion of potential effects to the EIS. Provide information to address the item, such as effects of increased flow above baseline levels, contact/stormwater discharge, and including mitigation to the impacts. Requested Action: Update the EAW with the requested information.	The Project believes the project description provided in section 12.b.i.3 of the EAW is sufficient to scope the EIS. The project description will be updated during EIS development to satisfy the EIS scope. Effects, impacts and mitigations will form part of the EIS.	Resolved. Requested Action: None.
512	12.b.i	1344				The EAW included an estimation of mine inflow as one number – peak life of mine inflow. Would it be more useful to know the inflow in stages? What is this number based on? Is the inflow expected to be spatially variant (getting back to enhanced permeability)? Requested Action: Answer questions and update EAW as appropriate.	The inflow estimate is based on the frequency of conductive zones identified by preliminary groundwater characterization completed prior to 2020, multiplied by the mine development linear meters using screening level analytical equations including some conservatism to develop a range for scoping. The Project has since collected additional data that would be used to develop, with consultation on input parameters, conceptual model and modeling approaches, for the EIS to update the project description. The Project believes that the provided estimate is sufficient for scoping the EIS.	Resolved. Requested Action: None.

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513	12.b.i	1344				<p>Provide more information to show how the inflow rates were calculated. Relying on data only up to 2020 may be inadequate when "Significant additional hydrogeological data has been collected since 2020". Current data should be used to calculate inflow rates, and include or reference all data and analysis.</p> <p>Requested Action: Provide additional information on the inflow rate data.</p>	<p>The inflow estimate is based on the frequency of conductive zones identified by preliminary groundwater characterization completed prior to 2020, multiplied by the mine development linear meters using screening level analytical equations including some conservatism to develop a range for scoping.</p> <p>This preliminary estimate informed a more intensive data collection program starting in 2020. The data that has been collected since 2020 is in the process of being validated, checked, analyzed and updated. This expanded dataset will support a rigorous and comprehensive modeling approach for the EIS conceptual and numerical groundwater model.</p>	<p>Forward verbatim.</p> <p>Requested Action: Add text to address comment.</p>
514	12.b.i	1344				<p>The methods and data used to estimate the mine inflow rate should be provided in sufficient detail to allow reviewing the calculations. In particular, how flow along lithologic contacts and faults was quantified needs to be described, including methods for hydraulic conductivity testing of fractured bedrock (such as packer testing and core description).</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>See Response to Comment #513.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
515	12.b.i	1344				<p>A reference is needed for "a peak life-of-mine inflow of 800-1,600 gpm".</p> <p>Requested Action: Provide reference material requested.</p>	<p>The inflow estimate is based on the frequency of conductive zones identified by preliminary groundwater characterization completed prior to 2020, multiplied by the mine development linear meters using screening level analytical equations including some conservatism to develop a range for scoping.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
516	12.b.i	1352				<p>The amount of contact water generated on the surface should not be evaluated solely based on the maximum average of approximately 40 gpm. This evaluation should also consider the flow rate that would be routed to the wastewater treatment facility under an extreme precipitation event.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>This statement in the EAW does not indicate that the design of the water treatment and storage facility will be dictated by the average precipitation, but rather shows that the contact water treatment and handling system will be driven by the underground mine inflow volumes. In addition to this, the contract water drainage, storage, and treatment system is proposed to be designed as described in lines 1439 - 1440. Line 1358 was updated and the word "maximum" was removed to avoid confusion.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
517	12.b.i	1352				<p>It should be specified whether areas outside of the 1,148,000 square foot "contact water area" could generate runoff that flows through that area, increasing the volume of contact stormwater that would need to be treated.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The facility would be designed so that no additional water would enter the contact water area for the design storm event. Relevant text added to the EAW data submittal to provide additional context.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
518	12.b.i	1356				<p>Runoff during individual storm events can exceed 40 gpm, and will likely exceed underground mine inflow rates. Therefore, it is not agreed that 40 gpm is a conservative estimate of the maximum amount of runoff from the contact water area that may need to be treated because it assumes the precipitation rate is constant over the entire year. Runoff from individual storm events should be evaluated to estimate the maximum amount of water that will need to be stored and treated. More</p>	<p>The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.</p>	<p>Forward verbatim.</p> <p>Requested Action: None.</p>

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						discussion is needed to regarding the maximum storm size that will need to be evaluated. Requested Action: Future discussion item.		
519	12.b.i	1357				Converting rainfall to an average flow of 40gpm spread out over a whole year is not necessarily a helpful conversion due to the sporadic and seasonal nature of precipitation. Depending on how the system is designed and the amount of equalization capacity, discharge is likely to be significantly higher during spring/runoff and discharge may be negligible for winter months. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. See Response to Comment #516.	Resolved. Requested Action: None.
520	12.b.i	1358				DNR notes that stormwater generation with the project is likely to receive detailed analysis in the EIS. Whether the proposed estimated maximum average of 40 gpm that would be routed for treatment constitutes a "conservative estimate" remains to be determined. Also, whether the "maximum average" is the most insightful measure remains to be seen, for example when accounting for extreme precipitation events in the impact assessment. Requested Action: Address comment and update EAW as appropriate. Future discussion item in development of Draft Scoping Decision Document.	Comment is noted. See Response to Comment #516.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
521	12.b.i	1364				Information on treatment plant design and the data used will need to be provided. Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.
522	12.b.i	1368				Detailed stream flow modeling should be performed using HEC-RAS or another stream flow modeling program to demonstrate that the north ditch network has the capacity to handle discharges from the water treatment plant and the sanitary treatment plant without causing adverse impacts to the downstream receiving waters and infrastructure. StreamStats is not a sufficiently accurate tool for this application. Results from StreamStats must always be field verified. Modeling should be supported by and calibrated to site specific monitoring data. Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.
523	12.b.i	1368				Potential effects of increased flow on hydrology, wetlands, and shallow and deep groundwater flow systems should be included in the bounding analysis based on the quantitative groundwater flow model. (See comment for Line 1308.) Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.

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524	12.b.i	1371				<p>Use of stream guidelines for ditch conditions may be inappropriate. Peatland ditches may not respond to changes in flow in the same way as streams. Provide references that describe ditched peatland hydrology for basis of preliminary evaluation of discharge capacity in ditches.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Multiple stream flows were analyzed and compared for the capacity evaluation, including flow monitoring. Additional flow monitoring is ongoing. Data and analysis of the wetland/channel interaction would be included in the EIS data submittal to evaluate potential impacts on the channel for various flow and climate scenarios.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
525	12.b.i	1371				<p>Further explain the logic behind the initial evaluation of ditch capacity to handle the proposed discharge of treated water. The concept of channel forming discharge applies to periodic high flow events for an alluvial channel, not a persistent discharge in a ditch. The extended duration of increased flows for pumped discharge may cause greater sediment transport than a short-term runoff event of similar discharge. Provide a reference for the stream adaptation statement on lines 1373-1374 and clarify what "adaptation" means in this context. What physical changes are expected (e.g., increased bank erosion and downstream sediment transport)? An alternative method to evaluate impacts to the surface drainage network should be provided.</p> <p>Requested Action: Address comments and update EAW as appropriate. Future discussion necessary regarding alternative methods.</p>	<p>This statement is based on the guidance provided by the MNDNR during a working meeting discussion and the provided document Report to the Minnesota State Legislature: Definitions and Thresholds for Negative Impacts to Surface Waters from January 2016. This document has been referenced and used in similar analysis and projects to set the allowable discharge rate to 20% of the channel forming flow.</p> <p>Adaptation in this context means that the channel characteristics are typically able to respond to this change in flow rate without significant changes to the channel characteristics.</p> <p>The channel may have some geomorphic changes that could result in some additional sediment transport downstream as the banks and channel bottom are shaped by the increased flow rate. Some areas of the channel downstream could see sediment accumulation in areas from this additional sediment transport. This is only conceptual and requires additional characterization, data collection, and evaluation. A detailed analysis and further evaluation of the potential impacts to the surface drainage network will be conducted for the EIS data submittal.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
526	12.b.i	1373				<p>These assumptions about the ditch that would be used for discharge must be fully supported by data and analysis. Extreme precipitation events must be factored into the analysis</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Additional data collection is underway and further analysis of the discharge and potential channel impacts is planned in future phases of project design, EIS development, and permitting. This analysis will include design storm event analysis with the discharge as well as typical values.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
527	12.b.i	1379				<p>Does Talon propose to obtain supplemental information regarding stream channel morphology and watershed characteristics to allow modeling of in-channel impacts from the project to the receiving water/ditch? Would this include the mean, maximum, and minimum monthly flows, while seasonal timing data could be used to address pre-project, operations, and post-closure instream flows to support assessment of impacts to instream aquatic resources?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
528	12.b.i	1379				<p>Does Talon propose to use detailed reporting from the PART and any other analyses regarding assessment of baseflow?</p> <p>Requested Action: Answer question.</p>	<p>Modeling and analysis methods for baseflow separation determination will be used to develop conceptual models informed by data collected in relevant streams and ditches.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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529	12.b.i	1384				<p>Impacts related to discharges from the water treatment plant and the sanitary water treatment plant should consider the wetland bounce and inundation to downstream wetlands, thermal impacts, and water quality standards specific to wild rice.</p> <p>Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
530	12.b.i	1387				<p>Impacts related to climate change should evaluate all sources of information; for example, in addition, to taking historical trends and climate change projections into account, evaluation should also consider the extreme events in the historical data set by utilizing the NOAA Atlas 14 values on the 90% confidence intervals and by simulating local extreme precipitation events by completing storm transposition (e.g., the impacts of simulating the extreme precipitation event that hit the City of Duluth which is 50 miles from the project site).</p> <p>Requested Action: Provide information regarding the sources of information</p>	<p>Comment is noted.</p> <p>The methodology and sources for future climate change projections used in the various assessments will be detailed for the EIS data submittal.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
531	12.b.i	1387				<p>Uncertainty and predicted ranges of modeled changes should be considered instead of simply using long term trends (e.g., in lines 960-964 proposer describes changes in annual average precipitation projections as an average of +1% from baseline average. But the estimates range from -14% to +29% and represent very different conditions under which to consider impacts to discharge and water quality).</p> <p>Requested Action: Provide information regarding the sources of information</p>	<p>Comment is noted.</p> <p>Models will be subjected to a sensitivity analysis to consider the range from the climate models for relevant climate parameters.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
532	12.b.i	1387				<p>Were conclusions about stormwater runoff, groundwater recharge, and other aspects of site hydrology informed by data other than NOAA Atlas 14; for example, using current estimates of rainfall depth-duration-frequency? Did conclusions account for climate change that has already occurred but is not represented in standard hydrologic references?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The project descriptions presented in the EAW regarding climate parameters were based on EAW reference 8 and 9 for historic data and EAW reference 10 for anticipated future climate projections. The Project believes this level of detail is sufficient for EIS scoping. A more detailed analysis of the predicted effects of climate change on the Project will be provided as part of the EIS data submittal.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
533	12.b.i	1387				<p>It was stated in lines 968-969 that the EPA Climate Resilience Evaluation and Awareness Tool anticipates an increase in the 100-year storm intensity of 13.5% in 2030 and 26.3% in 2060 indicating storm intensity will increase during the project lifetime. More discussion is needed regarding what size storm event will be used to evaluate impacts from discharges on receiving waters.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The methodology and sources for future climate change projections used in the various assessments will be detailed in the EIS data submittal.</p>	<p>Forward verbatim.</p> <p>Requested Action: Modify text to address comment.</p>

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534	12.b.i	1390				DNR notes that water modeling will need to account for local climate trends around variability and trends as applied to this part of Minnesota. The project area is already wetter and warmer than past conditions, with precipitation extremes increasing all seasons (that is expected to continue). Requested Action: Advisory only. Future discussion item for development of Draft Scoping Decision Document.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.
535	12.b.ii	1399				The EAW states that, "The current stormwater management plan is designed to manage up to the 200-year, 24-hour storm event until such contact water can be routed to the water treatment plant for treatment." Why was a 200-year storm event chosen? Should longer durations be evaluated? Requested Action: Address comment. Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Forward verbatim. Requested Action: None.
536	12.b.ii	1399				What modeling/data/references support the following statement in the EAW: "Current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount are not expected to significantly influence the environmental effects from stormwater discharges on receiving waters"? Requested Action: Address comment and update EAW as appropriate.	The assessed effects of climate change used for the EAW data submittal are summarized in Graphic 18 and on line 960 to 964 of the EAW text. The projections of climate change effects on the Project will be discussed in greater detail in the EIS data submittal.	Resolved. Requested Action: None.
537	12.b.ii	1434				What information or data support the following statement in the EAW: "environmental effects from industrial stormwater discharges on receiving waters are anticipated to be minor"? Requested Action: Address comment and update EAW as appropriate.	Comment is noted. See Response to Comment #536.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
538	12.b.ii	1436				Extreme rainfall events must be consider in the design of the stormwater treatment system. Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
539	12.b.ii	1439				State where the precipitation #'s are coming from (i.e. Atlas 14?) Also provide the rainfall amount. Requested Action: Address comment and update EAW as appropriate.	The Comment in question refers to Reference 9 of the EAW. Reference 9 of the EAW refers to NOAA, Atlas 14, which is a 24-hour, 200-year event at 6.98 inches for the Project Area.	Resolved. Requested Action: None.
540	12.b.ii	1441				More details are requested in the next data submittal, specifically a map indicating the proposed discharge locations. Requested Action: Provide additional information on discharge locations, including a figure as requested	Figure 5 shows the proposed discharge location and route via the public drainage system. This will be further evaluated during in the EIS.	Forward verbatim. Requested Action: Edit figure and/or EAW text to be consistent.
541	All EAW	1441				Looking at the site picture (Figure 3), the hydrology looks like there is some runoff discharging north at the end of the rail line. When the rail cars are stored on site, what is the possibility of any contaminants being drained into the nearby unnamed channel if it were to rain on the site? Requested Action: Answer question; modify text if warranted.	The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.

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542	12.b.ii	1444				<p>All discharge routes and receiving waters for all discharges should be clearly shown. It is unclear if ditches will need to be constructed if water is discharged to wetlands and not to existing ditches. If ditches will need to be constructed through wetlands, the impacts from the ditching should be fully evaluated.</p> <p>Requested Action: Provide additional information on overall discharge plans and update EAW as appropriate.</p>	<p>Figure 5 shows the proposed discharge location and route. This will be further evaluated during the EIS process. The Project will address, as necessary, the public drainage system in the EIS.</p>	<p>Forward verbatim.</p> <p>Requested Action: Edit figure if possible</p>
543	12.b.ii	1450				<p>Disagree that the effect of adding impervious surface is "minimized" or "mitigated" by collection, treatment and discharge of contact water. Added impervious surfaces results in the discharge of water directly to surface waters instead of allowing it to infiltrate into the ground, resulting in a slower discharge to nearby surface waters.</p> <p>Requested Action: Address comment.</p>	<p>All contact water would be collected for water treatment. Impervious surfaces in the contact water collection area would be designed to direct water to a Contact Water Collection Sump and then transferred to the Contact Water Treatment Plant.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
544	12.b.ii	1453				<p>Clarify meaning. How will discharge of treated water mitigate altered surface hydrology in the immediate vicinity of the project area?</p> <p>Requested Action: Address comment.</p>	<p>The losses to the water budget from the capture of runoff in the contact area would be partially offset by discharge of water from the treatment plants. The Project will address, as necessary, these effects in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
545	12.b.ii	1459				<p>See comment about Item number 7.a., Line number 901-975. (Future climate projections and additional information about past climate can be found at www.heat.gov and www.heat.gov/pages/climate-explorer)</p> <p>Requested Action: Note comment.</p>	<p>Comment noted and reference received.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
546	12.b.ii	1461				<p>Were closure and reclamation periods considered in addition to the operation periods?</p> <p>Requested Action: Answer question and update EAW as appropriate.</p>	<p>The EIS will consider climate projections for all phases of the Project. The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
547	12.b.ii	1461				<p>Text states that the water balance in the area (precipitation and evapotranspiration) is expected to remain in the current range over Project lifetime. Evapotranspiration trends are not addressed or described elsewhere in the submittal. Additional information is needed to support the statement.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Item addressed in the EAW data submittal by deleting "(precipitation and evapotranspiration)". More detailed climate projections will be considered, as necessary, and incorporated in the EIS.</p>	<p>Forward verbatim.</p> <p>Requested Action: Provide supporting information as requested.</p>
548	12.b.ii	1464				<p>The proposer should identify the requirements that are going to be the most restrictive to discharge and/or other impacts from the site. Water quality standards to address impacts to wild rice may be the driver for stormwater management and wastewater treatment. The standards noted by the proposer in this section are likely not the over-riding drivers for treatment.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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549	12.b.iii	1470				<p>The EAW states, "The potential maximum daily withdrawal from this well for potable water use could be up to approximately 13,200 gpd (4.8 million gallons per year)." Even if the impact during mine operation is expected to be minimal, the EIS should evaluate the impact of the operation on the quality and quantity of the aquifer such that it would be more susceptible to risk factors in the years following the mining operation.</p> <p>Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.</p>	Comment is noted.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
550	12.b.iii	1470				<p>Is there modeling to support the statement in the EAW: "The Project's water use of potable water would be resilient with respect to climate trends...."? What other uses of groundwater are expected/anticipated during the operational timeframe?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The Project believes the potable water supply is resilient due to the presence of thick, saturated Quaternary sediments. The relevant data collected would be provided to inform the EIS analyses and validate that the aquifer can support potable water requirements to the Project without significant environmental impacts.</p> <p>This specific paragraph only discusses potable water requirements, non-potable water requirements are described in lines 1507-1516.</p>	Forward verbatim. Requested Action: Answer question and modify text as warranted.
551	12.b.iii	1470				<p>What is the current expected need of non-potable water?</p> <p>Requested Action: Address comment.</p>	Non-potable water requirements are described in lines 1507-1516. With the current level of engineering design and preliminary assumptions it is estimated that the operational mine would require approximately 200 gpm +/- 100 gpm, this may change as the engineering design progresses and a more accurate number would be provided for the EIS data submittal.	Forward verbatim. Requested Action: None.
552	12.b.iii	1484				<p>More information about the groundwater appropriation for temporary construction dewatering, potable use, non-potable use, and pumping of groundwater inflow to the underground mine will be needed. DNR will need to evaluate potential impacts from the proposed appropriations.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The details for water appropriation and impacts will be evaluated in the EIS.</p>	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
553	12.b.iii	1488				<p>How would the removal of groundwater be temporary? Would water be pumped back into the ground?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	During construction, it might be required to remove groundwater from certain areas temporarily to allow construction. Once this construction is complete, the pumping for this purpose would be terminated, and groundwater levels would be allowed to recover, thus temporary.	Resolved. Requested Action: None.
554	12.b.iii	1488				<p>Identify how or if dewatering for mine infrastructure or mine workings (construction and ongoing during mine operations) will or potentially will affect nearby water supply wells.</p> <p>Requested Action: Comment noted. Addressed in other comments. EAW indicates that conceptual and quantitative groundwater flow models will be developed.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	Resolved. Requested Action: None.

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555	12.b.iii	1488				<p>Provide descriptions of any temporary dewatering that may be needed for the construction of the surface facilities and box cuts, including estimated dewatering amounts so that potential impacts to ground and surface waters from the temporary dewatering can be evaluated. A plan for monitoring ground and surface water impacts during construction should be developed.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The current level of design is not yet sufficiently developed to provide this level of detail. This information would be available and provided for the EIS data submittal to assess potential impacts due to temporary water removal for construction activities.</p>	<p>Forward verbatim.</p> <p>Requested Action: Add text to address comment.</p>
556	12.b.iii	1489				<p>Indicate on a map where the upland areas are and describe what is considered "upland" at this project site and please overlay the project features for clarity.</p> <p>Requested Action: Address comment and provide requested figure.</p>	<p>Upland areas for the project are defined in the EAW on lines 1758 to 1759. Graphic 19 was added to the EAW data submittal and text updated.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
557	12.b.iii	1493				<p>The EIS will require detailed information to develop a clear estimate of where from and how much water would be generated during the construction-related activities cited in the text. If known, this section would benefit from stating the depth from the surface the groundwater must be to begin construction along with an estimate of the volume of water expected. In other words how much water will have to be pumped to drop the surface levels to a depth that construction can commence at the site? In addition, will the mine access portals have seepage through the watertight barrier?</p> <p>Requested Action: Address the questions in the comment and update EAW as appropriate. Respond to questions as known. Future discussion item in the development of the Draft Scoping Decision Document.</p>	<p>The exact depth of foundation and box cut excavations as well as the lining design of the mine Declines are not yet finalized. This level of detail is being developed and would be available for the EIS data submittal. Standard construction water removal methods are expected to be implemented. Maximum preliminary volumes expected are stated in lines 1493-1495 and would be further refined for the EIS data submittal.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
558	12.b.iii	1493				<p>The methods and data used to estimate groundwater pumping rates for temporary construction dewatering should be provided.</p> <p>Requested Action: Future discussion item.</p>	<p>This would be refined, updated and more detail would be provided for the EIS data submittal when the engineering design is sufficiently developed.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
559	12.b.iii	1494				<p>Total water usage estimated at 50 million gpy. Does this include potable water (see line 1501)?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Potable water usage is stated in line 1500 - 1501. Line 1494 states "preliminary estimates are that the total amount of water would be less than 50 million gallons per year, which is the 1494 threshold for coverage under Temporary Projects General Permit No. 1997-0005." This does not refer to any other requirements for the construction or operational phase of the proposed Project.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
560	12.b.iii	1494				<p>How will the volume of water be monitored/determined?</p> <p>Requested Action: Address comment.</p>	<p>Comment is noted.</p> <p>See Response to Comment #557.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
561	12.b.iii	1494				<p>DNR will need to determine if construction dewatering will be covered under General Permit 1997-0005 or an individual water appropriation permit.</p> <p>Requested Action: Regulatory guidance. Future discussion item.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Forward verbatim.</p> <p>Requested Action: Modify text to address comment.</p>

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562	12.b.iii	1494				A reference is needed for the total amount of water to be withdrawn of "50 million gallons per day". Requested Action: Provide reference material requested.	This estimate is the upper limit for a temporary construction permit (line 1495). The construction dewatering amounts are expected to be less than this limit due to site conditions and preliminary design. The expected withdrawn volumes would be evaluated as part of the final design and provided in the EIS data submittal.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
563	12.b.iii	1500				References are needed for the estimated amount of potable water to be withdrawn (3.6 (average) and 4.8 (maximum) million gallons per year). Requested Action: Provide reference material requested.	A more detailed estimate of potable water requirements would be provided in the EIS data submittal, which would be based on final facility design. These estimates were generated by considering the anticipated workforce, discussed on lines 2224-2226 of the EAW.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
564	12.b.iii	1505				What plans are in place should the potable water not actually be resilient to future climate trends? Requested Action: Address comment.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
565	12.b.iii	1507				The EAW states that "the Project would primarily rely on the recycling of treated contact water." Water quality and water treatment system will need to be evaluated to determine the suitability for reuse and/or discharge Requested Action: Regulatory guidance. Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.
566	12.b.iii	1509				Any new non-potable well that will be used to supply water for the TBM and early stages of mine operations should be included in the EIS as well as the proposed appropriation amount so that potential impacts from the appropriation can be evaluated. Requested Action: Regulatory guidance. Future discussion item.	Non-potable water requirements for the TBM and early stages of the mine operations would be refined with further engineering and would be provided for the EIS data submittal.	Forward verbatim. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
567	12.b.iii	1511				How will this change in water level of the groundwater affect the surrounding hydrology of the area? Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
568	12.b.iii	1518				It may be incorrect to assume that the inflow water comes from deep TIC only. Information to support this assumption is not presented. It is likely that groundwater inflow would include water from above 400-foot depth as well as surficial deposits. Surficial water bodies and wetlands may be impacted. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. Indicates that conceptual and quantitative groundwater flow models will be developed. To be addressed in the EIS Requested Action: None.
569	6.b	1523				It will be necessary to understand what impacts to groundwater the water-tight liner would have, since it will be inserted into "saturated unconsolidated sediments (quaternary deposits)", and displacing the groundwater. Requested Action: Consider comment and edit text where anything is known at this time. Future discussion item for treatment of topic in Draft Scoping Decision Document.	The tunnel and liner are linear features and will not affect the bulk permeability, hydraulic gradients, or flow direction at project scale. The Project will address, as necessary, this issue in the EIS.	Forward verbatim. Requested Action: None.
570	12.b.iii	1523				Withdrawing ground water would most likely have an impact on surface water and wetland features especially if wetlands are primarily groundwater fed. The impact of changes in water	Comment is noted.	Resolved. Requested Action: None.

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						level on water quality should also be considered including mercury, DOC, and sulfate & sulfide concentrations. Requested Action: Address comment and update EAW as appropriate.	Future discussion item, as necessary, in development of DSDD.	
571	12.b.iii	1523				The hydrogeochemical evaluation should include assessment of the risk of Acid Mine Drainage and other mechanisms of contaminant mobilization. Requested Action: Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
572	12.b.iii	1526				All groundwater appropriations are required to be sustainable under MN Statute 103G.287, Subd. 5. Groundwater appropriations could be affected if it is determined that they are harming ecosystems, degrading water, or reducing water levels beyond the reach of public water supply and private domestic wells. Requested Action: Regulatory guidance. Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
573	12.b.iv	1528				As stated in the EAW, "... an estimated 21.7 acres of wetland including flooded borrow pits would be permanently impacted." How many acres of wild rice would be impacted or potentially impacted? Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address this question, as necessary, in the EIS.	Forward verbatim. Requested Action: None.
574	12.b.iv	1528				The EIS should evaluate potential permanent and temporary impacts to wetlands using an ecosystem-based approach. Requested Action: Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
575	12.b.iv	1528				Describe the surface, groundwater and wetland studies that are proposed to be performed during EIS preparation. Will there be a study on potential impacts to wild rice? Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address this question, as necessary, in the EIS.	Forward verbatim. Requested Action: None.
576	12.b.iv	1528				What areas are being considered for mitigation when they say, "Unavoidable wetland impacts would be mitigated through compensatory wetland mitigation such as purchasing wetland bank credits from approved wetland banks from the appropriate service area"? Requested Action: Address comment and update EAW as appropriate.	Comment is noted.	Forward verbatim. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
577	12.b.iv	1529				There will be direct wetland impacts as a result of proposed discharges from the water treatment plants into wetlands north of the Project Area. This is not discussed in response to 12.b.4.a. Provide a discussion of potential environmental impacts to wetlands, measures to mitigate environmental impacts, and rationale supporting the efficacy of these mitigation measures in the next submission. Requested Action: Address comment and update EAW as appropriate.	Potential impacts and mitigations to wetlands related to the discharge from the water treatment plants would be evaluated, as necessary, in the EIS data submittal.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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578	12.b.iv	1532				Impacts to the watershed and consideration of climate change are not included in the impact assessment. These appear to be headwater wetlands and consideration of watershed impacts is warranted. Consideration of climate change impacts may also be warranted given the potential for peatland impacts, which are carbon sinks. Requested Action: Address comment and update EAW as appropriate.	The assessment of impacts to relevant watersheds would consider climate change and would be discussed in the EIS data submittal.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
579	12.b.iv	1539				Peat accumulating wetlands are extremely sensitive to hydrologic changes and topographic changes (i.e., subsidence). Detailed explanation of how impacts will be avoided or minimized is justified. Requested Action: Address comment and update EAW as appropriate.	The assessment of impacts and mitigations to wetlands will be discussed, as necessary, in the EIS and permitting processes.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
580	12.b.iv	1539				Wetland sequencing and thorough alternatives analysis should be provided for all unavoidable impacts. Requested Action: Future discussion item. The comment is appropriate for the alternatives process. Issue deferred to development of the Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
581	12.b.iv	1539				Insufficient discussion of reasonably foreseeable physical, biological, hydrological, and geochemical wetland impacts that will require significant further study in EIS. More than half of project area is comprised of hydric soils and wetlands. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.
582	12.b.iv	1542				Further describe methods to remediate peat solid. Requested Action: Address comment and update EAW as appropriate.	The Project requires further clarification of this Comment.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action:
583	12.b.iv	1542				It is not clear if impact estimates are based on NWI or delineated wetland acreages. The data source should be specified and consistently identified. It is not clear the types of wetlands that are proposed for impact. A table would be helpful. Requested Action: Address comment and update EAW as appropriate, including requested table.	The estimated impacted wetland areas discussed on line 1544 were based on a Level 3 delineation. The requested level of detail regarding wetland types in the impacted area would be provided in the EIS data submittal.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
584	12.b.iv	1542				Information regarding the flooded borrow pits including, but not limited to, what the borrow material will be used for, where they will be constructed, their size, and whether water will be appropriated from them should be provided. Requested Action: Address comment and update EAW as appropriate.	The referenced borrow pits discussed on Line 1544 of the EAW refer to existing features within the Project Area.	Resolved. Requested Action: None.
585	12.b.iv	1543				More detail is needed about construction of the railway spur and the impact(s) to wetlands/surrounding area. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.

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586	12.b.iv	1543				<p>Will the railway spur be a permanent feature or will that be removed once the mine is closed? How will the construction of the railway spur affect waterflow in the peatlands?</p> <p>Requested Action: Address the questions in the comment and update EAW as appropriate.</p>	<p>The detailed design of the railway spur and its permanence as well as the potential effects of the railway spur on wetlands (such as hydrology and water quality) would be discussed in the EIS data submittal.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
587	12.b.iv	1545				<p>Provide additional detail on the scale and method of temporary impacts to wetlands. Are peatlands included in the accounting, as impacts to peatlands could result in permanent change?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The potential impacts to wetlands will be addressed in the EIS. Wetlands in the Project Area were delineated to a Level 3 standard.</p> <p>Level 3 is "intensive site assessment and uses intensive research-derived, multi-metric indices such as the Hydrogeomorphic Approach or Biological Assessments. They are meant to give detailed information regarding how well a wetland is functioning."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
588	12.b.iv	1545				<p>How might the removal/alteration/impact of area wetlands impact surface- and groundwater quantity and quality, and what efforts will be made to mitigate those impacts? How will this be monitored and what specific standards will be used?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>The impacts to surface water and groundwater quality and quantity from the removal / alteration / impact to area wetlands would be discussed in the EIS data submittal.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
589	12.b.iv	1548				<p>Describe potential indirect impact in more detail. For example, what activities might cause fragmentation or hydrologic changes (e.g., groundwater appropriation, subsidence from underground mining). Better define indirect impacts (e.g., complete loss due to drainage or wetland type change to altered hydrology).</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be addressed in the EIS</p> <p>Requested Action: None.</p>
590	12.b.iv	1550				<p>Describe how potential indirect impacts would be assessed.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
591	12.b.iv	1552				<p>Were wetland impacts not strictly defined by Clean Water Act and the Wetland Conservation Act considered, such as excavation in Type 1/2/6/7/8 non-jurisdictional wetlands or impacts to floristic quality?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>Please clarify the question being asked.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action:</p>
592	12.b.iv	1556				<p>Are wetland bank credits the only mitigation method being considered for impacts to wetlands?</p> <p>Requested Action: Comment noted. The EIS will examine other appropriate mitigations as necessary.</p>	<p>Comment is noted.</p>	<p>Forward verbatim.</p> <p>Requested Action: Add text to address comment.</p>
593	12.b	1576	8			<p>Documentation needed on legal status of on-site ditches. Legal abandonment proceedings through the Public Drainage Authority is needed for any Public Ditches. If so, a ditch abandonment process should be identified in Table 8 (line 1008).</p>	<p>Comment is noted.</p> <p>Abandonment of ditches is not proposed as part of the EAW.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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						Requested Action: Address comment and update EAW as appropriate.		
594	12.b.iv	1578				<p>There is no discussion of measures to mitigate impacts to downstream water as a result of treated water discharge (i.e., changes to water quality, water flow, temperature). Provide this information.</p> <p>Requested Action: Provide the information requested and update the EAW as appropriate.</p>	<p>Potential downstream impacts from water treatment discharge would be addressed in the EIS data submittal.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
595	12.b.iv	1581				<p>Define typical watercraft.</p> <p>Requested Action: Provide definition.</p>	<p>The EAW data submittal was edited by deleting:</p> <p>"Surface waters within and 1-mile downstream of the Project Area are not navigable by typical watercraft, so this use would not be affected."</p> <p>and adding:</p> <p>"The Project does not anticipate impacting the number or type of watercraft usage within or downstream of the Project Area."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
596	13.a	1583				<p>A list of all mine activities that would use PFAS/PFOS compounds is needed. Listings of all solvents and chemicals used in the mine are needed. Detail on the volumes of waste, including waste from water treatment operations and their ultimate disposal locations should be provided.</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>The Project will participate in future discussions on this subject.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
597	13.a	1593		17		<p>In reference to Figure 16, what's the shallowest point for the stormwater pond location and is it possible for infiltration to be used?</p> <p>Requested Action: Answer question.</p>	<p>The Project requires clarification on the use of the term 'shallowest' in reference to the ground surface.</p> <p>See Response to Comment #381.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
598	13.a	1618				<p>Considerations should be made with respect to existing and future groundwater flow fields, drinking water wells, and location of any septic systems or leach fields.</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
599	13.b	1625				<p>Which solid waste types are expected to be recycled and what volume is expected? If there isn't a recycler in the area that would take the recyclables, would recycling be taken elsewhere to a recycler not in the area? If so, which recyclables would make sense to recycle locally, which recyclables would make sense to take elsewhere, and which recyclables would make no economic sense and would go to a landfill?</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Comment 599 has not been addressed. Future discussion item.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>

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600	13.b	1625				The EIS should evaluate options to maximize recycling of all waste generated by the Project. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
601	13.b	1630				With the overburden pile for mined material, where is the water flowing to? Is this going to the stormwater ponds or discharged into the nearby wetlands? Requested Action: Answer question.	Overburden is not a mined material. Please clarify which stockpile or activity is being referred to in this Comment.	Follow-up: Overburden is the rock or soil layer that needs to be removed to access the mined ore. The stockpile on site in graphic 1 of the EAW shows the location of what is being inquired about since this area doesn't have hydrology on the figure 4 map labeled. Where is this water flowing since the hydrology of the site looks like it may discharge into the surrounding wetlands? Requested Action: Answer question and update EAW as necessary.
602	13.c	1664				These measures mentioned in the text, in addition to being identified, should be supported with data about what and how much could be reduced/recycled. Requested Action: Consider comment; edit text as warranted.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Comment 602 has not been addressed. Future discussion item. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
603	6.b	1703				ANFO comes in a prill (pellet) form and as an emulsion. At a highly level what are the clean-up procedures if either of the ANFO forms spill? Requested Action: Answer question. The response can be considered in development of the Draft Scoping Decision Document.	The Project will comply with all local, state and federal regulations regarding management/storage and clean-up of explosive materials.	Comment 603 has not been addressed. Briefly describe how cleanup of hazardous materials would be conducted so that they could be properly disposed. Requested Action: Add text to address comment.
604	13.c	1715				Recognizing more detail to come in EIS, be sure to consider placement of materials with respect to any wells installed on site and groundwater flow directions/well capture areas. Remediation and potential water treatment needs should be addressed. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.
605	14.a	1751		11		The text and Figure 11 do not identify that many streams in the Big Sandy Lake Outlet and Headwaters and Big Sandy Lake watersheds have wild rice. Requested Action: Consider comment; edit figure and/or text as warranted.	The shaded waterbodies in Figure 11 show lakes and streams listed in Minnesota's Wild Rice Waters inventory as compiled by the DNR as part of the 2008 report "Natural Wild Rice" submitted to the Legislature. The Project used publicly available data for the EAW data submittal.	Resolved. Requested Action: None.
606	14.a	1751				The EIS should analyze any potential impacts to wild rice, not just in lakes and streams downstream of the Project, but also to wild rice upstream of the Project and in adjacent watershed due to the area being prone to flooding. Requested Action: Advisory; Future Discussion Item in Developing the Draft Scoping Decision Document	Comment is noted. The Project will address this question, as necessary, in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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607	14.a	1751				<p>Natural Resources field surveys should include impacted areas outside of the Project perimeter as well.</p> <p>Requested Action: Advisory; Future Discussion Item in Developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
608	14.a	1751				<p>Natural resources field survey information gathered for the EIS will need to be an ecosystem-based evaluation of potential impacts.</p> <p>Requested Action: Advisory; Future Discussion Item in Developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
609	14.a	1751				<p>There isn't much of an elevation difference between the two watersheds identified and the watersheds surrounding them. In flood years, this whole area has the potential to become one large lake. Any contaminants from the Project during flood times have the ability to spread upstream of the Project. EIS needs to evaluate this flood scenario and how the Project can affect fish and wildlife resources as well as habitats and vegetation in those other areas.</p> <p>Requested Action: Advisory; Future Discussion Item in Developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
610	14.a	1759				<p>Though it may be correct that the only watercourses in the Project Area are county ditches, these ditches could have suitable habitat and also drain to public waters (natural streams and lakes) that have suitable habitat and could be impacted by discharge or other Project activities. This needs to be addressed.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p> <p>The Project intends to conduct aquatic surveys in the summer of 2024 along the discharge route. Results of this survey will be included in the EIS data submittal.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
611	14.a	1761				<p>type and quality of habitats for fish, reptiles, amphibians should be provided and surveys for these beings should be part of the data gathering process. GLIFWC field observations of the ditch that is proposed to receive mine effluent confirmed the presence of turtles and insects.</p> <p>Requested Action: Future Discussion Item in Developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
612	14.a	1762				<p>Are mitigation measures being considered to protect nearby wild rice lakes? If so, what are they? If not, why not?</p> <p>Requested Action: Answer question. Discussion item for development of Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
613	14.a	1762				<p>Include the specific number of wild rice lakes (4 total)</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>The Project using data from the MN DNR has identified 3 wild rice lakes (table 11). The shaded waterbodies in Figure 11 show lakes and streams listed in Minnesota's Wild Rice Waters inventory as compiled by the DNR as part of the 2008 report "Natural Wild Rice" submitted to the Legislature. The Project used publicly available data for the EAW data submittal.</p>	<p>Use the most recent MPCA impaired waters list as project progresses. There are more up to date documents available.</p> <p>Requested Action: Update, if possible. If not, Advisory for the future.</p>

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614	14.a	1766				<p>Common wildlife is stated as present but no discussion of Species in Greatest Conservation Need or Wildlife Action Plan critical habitat is provided. Additional detail should be provided regarding potential important habitat within the project area. A more focused habitat decryption of direct surface development impacts could be provided beyond regional generalities. Ensure Minnesota Conservation Explorer is queried for potentially affected resources.</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.</p>	<p>Resolved at this stage. To be discussed in development of the EIS.</p> <p>Requested Action: None.</p>
615	14.a	1769				<p>Further detail of natural resources monitoring methods is warranted. No details are provided other than that data is being collected. Some knowledge of methods is needed to assess potential scoping needs.</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
616	14.b	1771				<p>IPaC did not identify the rusty patched bumble bee as a species potentially occurring in the Project area, but Minnesota DNR has (see: https://www.dnr.state.mn.us/rsg/profile.html?action=elementDetail&selectedElement=IIHYM24020). Surveys should be conducted to verify this, and state and federal guidelines should also be reviewed to make further determinations.</p> <p>Requested Action: Address potential concerns about the rusty patch bumblebee in the EAW.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Comment 616 has not been addressed. Future discussion item.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
617	14.b	1777				<p>This is a very cursory review of State-listed T&E species. All species from the state list (link below) with the potential to exist on site should be evaluated.</p> <p>https://files.dnr.state.mn.us/natural_resources/ets/endlist.pdf</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p> <p>The Project would appreciate guidance from the State of Minnesota on how to address this concern.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
618	14.b	1810				<p>The MN DNR has launched the Minnesota Conservation Explorer to provide consultation on potential impacts to NHIS data. The environmental review process should consider at what stage of review the project should be submitted to MCE for review.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.</p> <p>Please clarify the statement regarding "...to be submitted to MCE for review."</p>	<p>The EAW does not appear to include an MCE report as part of the submittal or MCE review letter from DNR. The referenced line numbers direct me to Item 15 of the EAW for Historic Properties.</p> <p>The EAW states that the NHIS database was queried by a third party consultant, which is not the same as the MCE review process. Further, no search radius appears to be stated for the NHIS data query. From the MCE website "Registered users can submit a proposed project and request an automated assessment of potential impacts to Minnesota's rare features. This review informs project proposers of any required actions to follow state law,</p>

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								recommended measures to avoid or minimize disturbance to ecologically significant areas or state-listed species, and, if needed, additional steps needed to complete the review. A Natural Heritage Review is required as part of Minnesota's environmental review process. In addition, a Natural Heritage Review is strongly encouraged for all projects as due diligence for following state law and considering impacts to Minnesota's Natural Heritage. " Requested Action: Submit to MCE and include in next submittal.
619	14.b	1810				The Minnesota Conservation Explorer should be queried to assess the potential for the project to impact state-listed rare species and natural communities. The results of this query should be reported in the data submittal and the correspondence provided to the RGU. Requested Action: Address comment and update EAW as appropriate.	The Minnesota Conservation Explorer is an instrument designed to improve the distribution of Minnesota's Natural Heritage Information and streamline the Natural Heritage Review procedure. A summary of the results was provided as part of the EAW data submittal (lines 1810-1815).	Resolved. Requested Action: None.
620	14.b	1821				The EAW indicates that no wild rice is present with the project area due to lack of lake habitat. Wild rice may be found in any shallow open water under suitable conditions. Given the large area of wetland within the Project Area, it is feasible that suitable wild rice habitat may be present. Requested Action: Identify potential wild rice areas within the Project Area	Comment is noted. See Response to Comment #632.	Resolved. Requested Action: None.
621	14.b	1821				It should be noted here (or elsewhere) that the state water quality standard for sulfate in wild rice waters is 10mg/L and that this project must comply with the standard in wild rice waters that have been identified in close proximity to the project. Requested Action: Address comment. Modify text if needed	Comment is noted. Monitoring would be completed as needed per Minnesota Rules, chapter 7050.0220 subpart.3a.	Follow-up: Please include 10 mg/L wild rice sulfate standard in EAW Requested Action: Edit text to address comment.
622	14.b	1823				Will baseline data collection be included in the EIS? It would be beneficial to include pre-mine wild rice status. Requested Action: Edit EAW, Include analysis in EIS	Comment is noted. Data and analyses collected and conducted in support of the Project would be included with the EIS data submittal.	Resolved. Requested Action: None.
623	14.b	1823				Wild rice may also be present in non-public waters. Requires thorough survey potential habitats downstream of project. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
624	14.b	1830				Bulk treatment of plant communities. Peatlands can often have unique and sensitive plant species. The EIS will need additional information about types of peatlands present to assess potential project impacts on peatland plant communities.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.

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						Requested Action: Advisory, Future discussion item in development of Draft Scoping Decision Document		
625	14.c	1845				<p>It should be noted that not all biota are mobile and have the ability to move from the project area in response to construction. Further consideration needs to be given to non or less mobile biota such as plants and invertebrates, as well as species vulnerable based on phenology or life stage such as nesting birds or overwintering amphibians. More detail should be included.</p> <p>Requested Action: Include information on these types of biota and how they will be impacted by the Project.</p>	<p>Comment is noted.</p> <p>Further studies on aquatic biota, both sessile and non-sessile are in the planning stages. Data from these studies would be included in the EIS data submittal.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
626	14.c	1845				<p>Project area lies between several public lands (e.g. WMAs, State Park, and State Forests) and could be considered to be along a wildlife corridor</p> <p>Requested Action: Discussion topic</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
627	14.c	1852				<p>Discussion of future climate trends on project impacts does not adequately address uncertainty of climate predictions.</p> <p>Requested Action: Advisory, Future discussion item in development of Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
628	14.c	1864				<p>If federal laws are followed impacts to species can still occur. The DEIS should analyze and disclose impacts to species whether those impacts meet a legal criteria or not.</p> <p>Requested Action: Advisory, Future discussion item in development of Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
629	14.c	1865				<p>Risk assessment is a useful tool for evaluating other sources of contamination, hazardous materials and hazardous wastes. Applying risk assessment methods will provide a sound technical basis for drawing conclusions about the potential impacts of other contamination sources.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
630	14.c	1867				<p>The date of last RPBB observation is used as justification that RPBB is not likely present within the Project Area. It is not appropriate to disregard a rare feature record based on date alone. Additional information demonstrating negative resurveys should be provided under this rationale, otherwise RPBB should be considered potentially present within the area.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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631	14.c	1873				<p>The impacts to the SBS appear to be disregarded based on lack of rare species records. However, the SBS is of moderate significance indicating that occurrences of rare species, moderately disturbed native plant communities, and/or landscapes that have strong potential for recovery of native plant communities are present within the Project Area and may be impacted. Lack of impact cannot be disregarded without provision of additional information that demonstrates more specifically why the area is mapped as an SBS and subsequent thorough assessment of potential impacts. For example, the SBS may have been flagged as an area likely to provide habitat for rare species, but may have never been ground surveyed.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
632	14.c	1876				<p>The text indicates that no wild rice is present within the Project Area. While it appears likely no extensive populations exist, it should be clearly demonstrated that no wild rice habitat is present rather than assumed wild rice is restricted to exclusively lakes.</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>Comment is noted.</p> <p>The EAW was written using publicly available data. As of the date of submittal, there have been no DNR surveys for wild rice in ditches surrounding the Project Area. Large Figure 11 has been updated to include stream reaches that are included in the DNR's Wild Rice Inventory dated February 2008.</p> <p>As stated in the EAW data submittal:</p> <p>"While impacts to wild rice lakes are not anticipated from the Project, a baseline wild rice habitat delineation is being conducted for the Project in downstream waterbodies."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
633	14.c	1876				<p>Groundwater drawdown and surface water inundation from the project pumping activities would be expected to negatively impact nearby wild rice waters including Big Sandy and Tamarack lakes and Tamarack and Minewawa rivers. If there is data that suggests nearby wild rice waters will not be impacted by the project, please provide the data to support that hypothesis.</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>Comment is noted.</p> <p>Mathematical models will be developed for the EIS that will be used to assess changes to levels and flows (surface water and groundwater) from the proposed mine activities.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
634	14.c	1880				<p>Colonization of an area by invasive species can also be encouraged by changes in hydrology and water chemistry resulting from mining discharge. Peatlands are susceptible to cattail invasion following changes in hydrology and geochemistry.</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>Comment is noted.</p>	<p>Follow up--Unclear how noting the comment addresses the comment? Perhaps an issue for further discussion?</p> <p>Requested Action: Identify how this issue will be addressed in EIS.</p>
635	14.d	1890				<p>Very little detail is provided regarding potential impacts to aquatic biota. More detail should be provided about potential impacts from discharge based on water quality standards and how those standards will be met.</p>	<p>Comment is noted.</p> <p>See Response to Comment #625.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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						Requested Action: Address comment. Modify text as needed		
636	14.d	1890				<p>This sentence does not align with what has been previously noted in section 12 of the EAW. The responses to prompts in section 12 acknowledge potential for direct/indirect impacts to downstream waters as a result of the release of treated waters. If downstream impacts could be anticipated, it is likely there is potential for impacts to aquatic biota. Please provide data to support the statement in line 1890.</p> <p>Requested Action: Address comment. Modify text as needed</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
637	14.d	1890				<p>Discharge is not the only potential impact to aquatic resources. Impacts to wetlands are proposed and likely include indirect impacts also. Groundwater withdrawals are also proposed. Broader consideration of potential impacts to aquatic resources should be considered.</p> <p>Requested Action: Address comment. Modify text as needed</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
638	14.d	1890				<p>It is stated that "direct impacts to aquatic biota are not anticipated because Project discharge would meet all applicable water quality standards". However, changes to water quantity (flow) can impact aquatic biota as well as changes to water quality. This needs to be addressed.</p> <p>Requested Action: Address comment. Modify text as needed</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
639	14.d	1893				<p>Underground mining techniques are stated to reduce impacts to wildlife habitat. However, no explanation is provided as to how or to what extent impacts are minimized. No consideration of impacts to plant communities is provided. Peatland plant communities are sensitive to even minor changes in hydrology. Many rare peatland plants rely on fine scale microtopography. Detailed explanation of how impacts will be avoided or minimized is justified.</p> <p>Requested Action: Address comment. Modify text as needed</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
640	14.d	1894				<p>The extent of the fenced area is not specifically described. Depending on the extent of the fenced area, fragmentation impacts could be larger than expected. For example, this could preclude use of suitable habitat by federally listed lynx and gray wolves for the duration of the fencing. The extent of the fenced area and type of habitat within should be further specified.</p> <p>Requested Action: Address comment. Modify text as needed</p>	<p>Comment is noted.</p> <p>See Response to Comment #626.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
641	15	1899				<p>The distance and visibility from Big Sandy Lake should be evaluated. Big Sandy lake is the site of the annual Ojibwe Sandy Lake Ceremony. Assessment of noise, vibration, and traffic changes is needed.</p> <p>Requested Action: Advisory. Future Discussion topic for development of Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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642	15	1900				<p>The Assiniboine, Gros Ventre (Atsina), Cree, and Tionontati, are other Indigenous groups that have called the Project area home before being relocated westward and northward. They should be included in this section.</p> <p>Requested Action: Address comment. Modify text as needed. Future discussion topic for Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Comment 642 has not been addressed. See comments regarding Comment 645 not being addressed.</p> <p>Requested Action: Add text to address comment.</p>
643	15	1900				<p>The Minnesota Office of the State Archaeologist (OSA) Portal for archaeological sites was reviewed on May 16, 2022. But there also needs to be a review of Dakota and Ojibwe toponymy of the area because area features, area resources, area habitat, etc., are encoded in those toponymies. They tell us information on land uses and functions.</p> <p>Requested Action: Address comment. Modify text as needed.</p>	<p>Comment is noted.</p> <p>The Project is interested in reviewing the inclusion of toponymies in the EIS data submittal when discussing the development of the DSDD, based on current proximate tribal nations.</p>	<p>Comment 643 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
644	15	1900				<p>In addition to viewing state historic preservation office record, the area's tribal historic preservation office should be engaged to conduct a detailed survey from an Indigenous perspective.</p> <p>Requested Action: Advisory. Future Discussion topic for development of Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
645	15	1900				<p>The sentence "The Project is located on the traditional, ancestral, and contemporary lands of the Očhéthi Šakówiŋ (Dakota/Lakota), Mdewakanton (Dakota/Sioux), and the Anishinaabe (Ojibwe) peoples." is strangely worded. The Dakota description provided is akin to saying like saying "the Anishinaabeg and the Ojibweg", where Anishinaabe may or may not be Ojibwe, but Ojibwe are Anishinaabe. So, why this particular wording?</p> <p>Requested Action: Address comment. Modify text as needed</p>	<p>According to our understanding, the Project is located on the Očhéthi Šakówiŋ and the Anishinaabe original territories. The Project is open to suggestions for preferred language.</p>	<p>Comment 645 has not been addressed. Change first sentence to say "The Project is located on the traditional, ancestral, and contemporary lands of the Očhéthi Šakówiŋ (Mdewakanton Dakota) and the Anishinaabe (Ojibwe) peoples, and many others forgotten in time." for clarity and broader inclusion.</p> <p>Requested Action: Add text to address comment.</p>
646	15	1900				<p>Grayling Marsh and the Tamarack River are connections between the Mississippi River and the Kettle River systems. There may be many undocumented cultural properties in the area, so a detailed archeological survey is needed. Additionally, the wetland complex of the area had been known for use as burial sites, to the possibility of inadvertent discovery is high. EIS needs to further evaluate this.</p> <p>Requested Action: Future Discussion and EIS topic</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Comment 389 (RGU note: also Comment 646) regarding Native American burials in wetlands not addressed. Consider a brief discussion on LIDAR survey of the area wetlands to verify no burial grounds or rice pits in the immediate vicinity.</p> <p>Requested Action: Add text to address comment.</p>
647	6	1910				<p>The assessment for Item 15 should include existing buildings on the property for evaluation of any potential historical significance (if that has not already been completed) for inclusion in the EIS.</p> <p>Requested Action: Advisory only; edit text if warranted.</p>	<p>Comment is noted.</p>	<p>Have any existing buildings on the property been for evaluated for any potential historical significance? If not, should be included in EIS</p> <p>Requested Action: Answer question; Modify text as necessary.</p>
648	13	1910				<p>A risk assessment is a useful tool for evaluating project-related generation/storage of solid wastes, project-related use/storage of hazardous materials, and project-related generation/storage of hazardous wastes. Mentioning these applications of risk assessment would assure the reader that a sound technical approach will be implemented to address solid waste, hazardous materials, and hazardous wastes.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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649	15	1911				<p>For consistent terminology, a definition of archaeological site should be included. An archaeological sites is "a location that contains the physical evidence of past human behavior that allows for its interpretation." (Advisory Council on Historic Preservation) Any location that is 50 year or older are to be documented.</p> <p>Requested Action: Address comment. Modify text as needed</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
650	15	1923				<p>This section should include a statement that the previously recorded architectural resources will be revisited and re-evaluated during the cultural resources inventory and that all buildings within the indirect APE as defined by the USACE will be noted and evaluated as needed.</p> <p>Requested Action: Address comment. Modify text as needed</p>	<p>Comment is noted.</p>	<p>Not resolved. Please include a statement that the previously recorded architectural resources will be revisited and re-evaluated during the cultural resources inventory and that all buildings within the indirect APE as defined by the USACE will be noted and evaluated as needed</p> <p>Requested Action: Add text to address comment.</p>
651	15	1924				<p>Assessment of potential impacts to archeological resources could benefit from MnDOT's "MN Model", which is a set of mapping tools that help the contractors and agencies assess potential impacts on archaeological resources throughout Minnesota. Model data shows that the area in and around the proposed project area has not been covered through previous inventories. The applicability of this model remains to be determined.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
652	15	1929				<p>This section should include text saying the planned cultural resources inventory would be conducted and directed by a Secretary of Interior-qualified archaeologist and architectural historian and would meet Minnesota State Historic Preservation Office and Minnesota State Archaeologist standards. If there are plans for the survey team to include cultural resource specialists from regional tribes who will assist with the identification and evaluation of archaeological resources, that should be included.</p> <p>Requested Action: Consider comment; edit figure text as warranted.</p>	<p>This issue is addressed in lines 1930-1938 in the original EAW and the Project will comply with all applicable legal requirements in conducting a cultural resources inventory.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
653	15	1929				<p>The EIS could require identification of other types of archeological and cultural resource investigations, for example an Ethnographic Overview and Inventory report of potential Traditional Cultural Properties and cultural landscapes if required by the Corps of Engineers</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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						Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document		
654	15	1930				<p>As the project area involves state land, any archaeological investigation will also need a field investigation permit from MnOSA and the Minnesota Indian Affairs Commission under Minnesota Field Archaeology Act (MS 138.31-138.42). The review of the project and its associated cultural and archaeological resource studies will be reviewed by the Minnesota Office of the State Archaeologist and will be conducted concurrently with the Section 106 review. A map of state vs. private lands would be helpful.</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>Comment is noted.</p> <p>Figure 6 was updated to include land ownership.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
655	15	1935				<p>The document correctly identifies the need for cultural resources investigations, including tribal cultural resources. These investigations should recognize the tribes have a very distinct role in assessment of potential impacts, including waters supporting wild rice stands. Also, there are treaty obligations concerning wild rice stands and usufructuary rights.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
656	15	1938				<p>Should Section 106 of the National Historic Preservation Act be required, evaluation of indirect impacts may likely include discharge into area waters and the effect on wild rice stands; a potential Traditional Cultural Property/Ethnographic Landscape. With the possibility of a 70+ foot structure on the plant, indirect APE may be defined as extending up to 1 mile from the project site. The inventory may include all areas associated with the proposed operation, including ground above the below-surface area of the mine and the railroad spur, including impacts to potentially sensitive areas supporting wild rice stands.</p> <p>Requested Action: Advisory only.</p>	<p>Comment is noted.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
657	15	1938				<p>Should note that the Section 106 consultation process will involve the MnSHPO, any and all interested Tribal Historic Preservation Offices, MnOSA, local and state officials (including the Minnesota Indian Affairs Commission), any local interested party or parties, USACE, and any other agency that has an interest in the project. At a minimum, the following tribes and nations will be invited to participate in the Section 106 consultation -- Apache Tribe of Oklahoma, Bad River Band of the Lake Superior Tribe of the Chippewa Tribe, Cheyenne and Arapaho Tribe of Oklahoma, Fond du Lac Band of the Minnesota Chippewa Tribe, Fort Belknap Indian Community of the Fort Belknap Reservation on Montana, Grand Portage Band of the Minnesota Chippewa Tribe, Keweenaw Bay Indian Community, Michigan, Lac Vieux Desert Band of the Lake Superior Chippewa Indians of Michigan, Lac du Flambeau Tribe,</p>	<p>Comment is noted.</p> <p>See Response to Comment #652.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

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						Lac du Flambeau Band of Lake Superior Chippewa Indians, and the Leech Lake Band of the Minnesota Chippewa Tribe. Other interested organizations and tribes would also be encouraged to participate the consultation process. Requested Action: Answer question. Edit text as necessary		
658	16	1946				A figure/map showing surrounding cover types and locations of residences/other mentioned sites would be useful Requested Action: Consider comment; edit figure and/or text as warranted.	Comment is noted and will be taken under consideration.	Resolved. Requested Action: None.
659	16	1963				Why are nighttime operations required? I would expect most of the light and noise pollution to be an issue at night and impacts would be minimized if those hours were avoided Requested Action: Answer question. Edit text as necessary	Various mitigation measures will be taken to address nighttime noise and light impacts, which will be further evaluated as part of the EIS. Nighttime operations are necessary because producing ore at the planned annual rate while operating only during daytime hours would require twice as much equipment operating simultaneously, much larger surface infrastructure to accommodate the much higher hourly throughput, a larger physical site footprint, greater traffic congestion, and ultimately higher overall environmental impacts.	Follow-Up: Review of noise and light impacts from proposed project remain a concern. Review of these issues will continue in future submittals. Requested Action: Advisory only; to be discussed in the development of the DSDD.
660	16	1998				The viewshed analysis should be performed for a "with trees" and "without trees" scenarios. The EAW state that the tallest building is 78 feet. If temporary features (e.g. construction cranes) are taller than 78 feet, then the height of the tallest feature should be used in the analysis. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
661	6.b	1999				Back at Item 6b at Line 528, the project description notes that an estimated up to 450KCY tons per year could be sourced aggregate, which translates to approximately 35 trucks per day with a 35 tons per truckload. Once this traffic enters the property, potential emissions could be considered in the: risk assessment; Class I modeling; Class II modeling. This traffic could be assessed as part of tailpipe on/offsite for GHG. Requested Action: Consider comment and edit document as current information allows. Future discussion item for development of Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
662	6.b	1999				Regarding the treatment of off-site aggregate in Item 6b at Line 526, bringing it on-site would need to be characterized within plan for air quality impacts. This would include, but be not limited, to haul road traffic, unloading, reloading, air emission estimates from dust and tailpipe emissions, and operating	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.

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						hours. Requested Action: Advisory only. Future discussion issue for development of Draft Scoping Decision Document.		
663	17.c	1999				Other point sources and non-point sources/mobile sources should be included in this section, such as locomotive, Operational Trucks, Mobile Equipment, Maintenance Activities, and emissions from water treatment facilities. Requested Action: Address comment and update EAW as appropriate.	An inventory of point and mobile sources will be developed, as necessary, as part of the EIS data submittal and air permitting.	Resolved. Requested Action: None.
664	23	1999				Underground mobile equipment emissions may be required to be categorized as point or stationary sources by MNR for Air Permitting purposes. Requested Action: Regulatory guidance. Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
665	17.a	2000				The EIS will do a detailed assessment of the air emissions profile. Potential pollutants of interest could include TSP, HCN, NH3, H2S, SVOC, and NMOC, as appropriate. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
666	17.a	2000				Does the definition of VOC in this document include SVOC and/or NMOC? Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	A mutually agreed upon definition of VOC will need to be developed during the EIS. Future discussion item, as necessary, in development of DSDD.	Comment 666 has not been addressed. Future discussion item. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
667	17.a	2000				Clarify what is meant by Carbon Dioxide Equivalent (CO2e) for this section. A comprehensive list of all pollutants included in CO2e would provide clarity. Requested Action: Address comment; modify text as warranted.	Carbon dioxide equivalent or CO2e means the number of metric tons of CO2 emissions with the same global warming potential as one metric ton of another greenhouse gas and is calculated using Equation A-1 in 40 CFR Part 98. The Project will develop a comprehensive list of all pollutants for the EIS and air permitting.	Comment 667 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: No action necessary.
668	17.a	2000				In addition to NOX, EIS should also be evaluating for hydrogen cyanide (HCN), ammonium (NH3), and hydrogen sulfide (H2S), as these are typical emissions from explosives. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
669	17.a	2007				Will the portals be located far enough apart that the intake air will not be recirculating the mine exhaust? Provide data to support this. Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	See Response to Comment #167.	Resolved. Requested Action: None.
670	17.a	2007				Will there be any baseline monitoring for ambient air prior to construction? Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	Currently, the Project considers existing State of Minnesota ambient air monitoring data to be sufficient for the project. The Project is not proposing to do any additional ambient air monitoring. The Project is planning on using MPCA/EPA baseline data.	Resolved. Requested Action: None.

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671	17.a	2007				<p>Will Mercury from the rock formation and peat add mercury to the air in addition to the impact on local waters?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	<p>Results from the materials characterization program, operating under a work plan approved by the RGU, will be used to conduct this analysis which will also provide inputs to air and multi-media deposition modelling. The results of these programs will be incorporated into the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
672	17.a	2007				<p>Would be good to lay out the key elements of a human health risk assessment and the approach (pursuant to specific guidance) to developing each element (i.e., preparation of a conceptual site model, identification of chemicals of concern, exposure assessment (including identification of sensitive and other receptor groups), toxicity assessment, and risk characterization). Also identify and at least briefly discuss the MPCA applicable requirements. This way the reader will know that we know what we are talking about.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
673	17.a	2017				<p>Elongated mineral particle review will need a thorough evaluation using approved MDH methodologies for air and water analyses.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
674	17.a	2019				<p>Will potential silica release be addressed?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	<p>The Project is currently collecting material characterization data and will conduct air emissions modelling that will be used to inform the design of facilities to protect human health in accordance with guidelines from the Minnesota Department of Health. Also see Response to Comment #115</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
675	17.a	2020				<p>As indicated, this document provides a high level review of projected emissions. Complete review of proposed project within the scope of the air regulatory requirements will occur when more information is provided by proposer.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
676	17.a	2021				<p>Elongate Mineral Particle assessment results were not included. NIOSH defines EMP as any mineral particle with a minimum aspect ratio of 3:1 and length > 0.5 um (NIOSH Bulletin 62, 2011). Describe method for sampling and analysis for the presence of EMPs.</p> <p>Requested Action: Address comment on EMP. Methodology is a future discussion item considered in development of Draft Scoping Decision Document.</p>	<p>A material characterization program is under way, The Project will have a complete EMP data set to inform the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
677	6.b	2022				<p>Back in Item 6b, Line 345 describes activities, such as generator sets, that appear to be construction activities, but are they not also operations? Will there be multiple air dispersion modeling scenarios to account for activities that are occurring at different phases of the mine's operations?</p> <p>Requested Action: Answer question; modify text as needed.</p>	<p>The Project considers certain activities which only occur during the construction phase, before the mine enters production, to be "construction". Construction operation are typically not modeled. The Project looks forward to future discussions regarding scope of air dispersion modelling.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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						Future discussion item in development of Draft Scoping Decision Document.		
678	6.b	2022				<p>Relating back to the discussion of ventilation in Item 6b (Lines 376-379), it will be important to consider the capture efficiency and control efficiency of any control system that is installed. These efficiencies will have a direct correlation to the emission rates that will need to be used in an air dispersion modeling from the portals. While this specific comment pertains to the mentioned CO and NO2 emissions from blasting, it is also pertinent to any other foreseeable pollutant that may be emitted and controlled at the portals. (This comment assumes that the "mine exhaust circuit" ultimately vents to atmosphere through the portals).</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
679	6.b	2022				<p>Relating to Item 6b at Line 484, it is likely important to identify what pollutants will be present in this exhaust air stream, how capture (and its related efficiency) will be achieved, and the proposed control strategies to assess impacts for the EUS. These will be needed for any proposed control efficiency credit in the air dispersion modeling.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
680	6.b	2022				<p>Relating back to the discussion of blasting in Item 6b (Lines 372-375), the randomness of a blasting schedule may pose issues for the air dispersion modeling. In an effort to not overestimate the occurrences of blasting and its associated air emissions, will this be addressed by using a schedule or simulated schedule in the air dispersion modeling?</p> <p>Requested Action: Answer question. Future discussion item where the response can be considered in development of the Draft Scoping Decision Document.</p>	<p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
681	6.b	2022				<p>The document indicates that emissions produced from both surface and underground activities would undergo a "filtration or scrubbing process to reduce the amount of suspended dust and particulates." Activities of interest would include (but not be limited to): site development; blasting; ore extraction; and transport. Would the planned mitigations be designed to avoid and/or control release of elongate mineral particles during these activities?</p> <p>Requested Action: Consider comment; modify text to address the issue.</p>	<p>Air pollution control equipment will be designed to control release of particulate and other pollutants into the environment. Control of particulates would also include control of elongate mineral particles.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>

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682	6.b	2022				<p>Relating to Item 6b at Line 483, the EIS analyses will likely require a detailed description of the filtration method for reduction of suspended dust and particulates. It is also likely that target goal be established for release into outside air (PM 10, PM 2.5, something else?). How levels will be monitored over time and mitigation methods in the event that the filtration method fails could also be required.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
683	6.b	2022				<p>Relating to Item 6b at Line 483, exhaust air will need full characterization of pollutants as well as final design on a filtration or scrubber system.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
684	17.a	2022				<p>Will there be additional air emission treatments during or after explosions? How will these differ from other operations ventilation?</p> <p>Requested Action: Answer question.</p>	<p>The mine exhaust particulate capture equipment would be utilized during both regular shift operations as well as during blasting. The Project will further address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
685	17.a	2022				<p>What kind of filtration or scrubbing process would exhaust air undergo before release?</p> <p>Requested Action: Answer Question. Future Discussion Item as part of developing the Draft Scoping Decision Document</p>	<p>The Project will address this question, as necessary, in the EIS.</p>	<p>Comment 685 has not been addressed. Future discussion item.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
686	17.a	2022				<p>Explosive emissions should be monitored for HCN, NH3, and H2S in addition to pollutants already listed.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>The Project will address this question, as necessary, in the EIS. Also see Response to Comment #121.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
687	17.a	2022				<p>There should be both a source of oxygen from the ventilation and an oxygen level monitor, so that there aren't pockets of low oxygen, especially if combustion sources are used in the mine.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
688	17.a	2022				<p>What about Personal Protection Equipment when personnel are in the exhaust stack source? Will all people be evacuated from the mine at each blast cycle?</p> <p>Requested Action: Answer question. Future topic of discussion for treatment of worker health issues in development of Draft Scoping Decision Document.</p>	<p>Levels of relevant gases in the mine ventilation exhaust circuit will be monitored in real-time, and particulate levels will be regularly sampled in alignment with health and safety requirements. Personnel will wear personal protective equipment (PPE) whenever they may be exposed to levels of gases or particulates beyond Mine Safety and Health Administration (MSHA) standards</p> <p>During and after blasting, personnel will not be allowed in the exhaust stream until gas levels are within MSHA standards for health and safety. During operations, all personnel will be evacuated from the mine prior to blasting.</p>	<p>Comment 688 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: No action necessary.</p>

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689	23	2022				<p>This section says underground emissions will exhaust through a stack. Is this in addition to the 2 portals? Line 269 in Orebody Access says no additional openings to the surface are anticipated.</p> <p>Requested Action: Answer question.</p>	<p>The two Portals are the only two locations at which the mine excavations cross to surface. The mine exhaust air will be vented out of the Mine Exhaust Stacks which are connected to the liner of the Exhaust Decline above surface grade prior to the Portal opening. The exhaust air will be diverted via above-grade ductwork through the liner to the Mine Exhaust Filtration Building and then to the Mine Exhaust Stacks. For layout diagram, reference Graphic 2 and Large Figure 3 from the initial Project Description. Also see Response to Comment #167.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
690	17.a	2031				<p>How will storage pile dust be controlled?</p> <p>Requested Action: Answer question. Edit text as necessary</p>	<p>Additional details regarding dust control will be included in the EIS. Additionally, a fugitive dust control plan will be developed as a part of the air permitting process. The fugitive dust control plan will address all fugitive emissions and discuss administrative controls.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
691	17.a	2038				<p>Explain why PSD construction permit requirements likely would not be triggered.</p> <p>Requested Action: address comment. Edit text as necessary</p>	<p>The Project made this determination based on the Tamarack Mining Project scope and scale being very similar to the Eagle Mine in Michigan, which did not trigger PSD review.</p>	<p>Comment 691 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: No action necessary.</p>
692	17.a	2038				<p>"MPCA Mercury Rick Estimation Method" should say "MPCA Mercury Risk Estimation Method".</p> <p>Requested Action: address comment. Edit text as necessary</p>	<p>Comment is noted.</p> <p>The Project will correct the typo "MPCA Mercury Rick Estimation Method" should say "MPCA Mercury Risk Estimation Method"</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
693	17.a	2056				<p>Will there be controls for other constituent in minerals such as cadmium, lead, chromium, etc., in addition to mercury?</p> <p>Requested Action: Answer question.</p>	<p>Controls for particulate matter will also control other metals.</p>	<p>Comment 693 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: No action necessary.</p>
694	17.a	2056				<p>Describe type and quantity of HAP expected. Provide sampling method and analysis data used to determine this.</p> <p>Requested Action: Answer question.</p>	<p>The Project is planning on using EPA factors for internal combustion engine emissions, and data from the material characterization program (conducted under an agency-approved work plan) for the ore and backfill materials.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
695	17.a	2058				<p>Is there a contingency plan if mercury is found to be contained in the ore and emitted?</p> <p>Requested Action: Answer Question. Future Discussion Item as part of developing the Draft Scoping Decision Document</p>	<p>The Materials Characterization Program is in progress and conducted under an agency-approved work plan. It will identify constituents of concern including mercury. Control equipment for particulate matter will be designed with the data from the Materials Characterization Program and will provide capability to control mercury-containing minerals if needed. At this time, the Project does not expect an issue with mercury-containing minerals within the ore or development rock based on available data.</p>	<p>Follow-up: Further review of Material Characterization Program when available will be necessary to evaluate constituents of concern.</p> <p>Requested Action: Update text if possible. Otherwise, future discussion item as part of developing the Draft Scoping Decision Document.</p>

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696	17.a	2063				It isn't just the Boundary Waters, Voyageurs, and Isle Royale that are Class I but also Rainbow Lake and Fond du Lac Indian Reservation. Requested Action: Consider comment; edit figure and/or text as warranted.	Comment is noted. To support EIS development, the Project would conduct a modeling analysis for the federally approved Class I areas near the Project Area that may include an initial screening, a significant impact analysis, and particle transport modeling analysis.	Comment 696 has not been adequately addressed. Change "conduct a modeling analysis for the Class I areas near the Project Area" to "conduct a modeling analysis for the Class I areas 200km of the Project Area" to remove ambiguity. Requested Action: Consider comment; modify text as warranted.
697	17.a	2063				Although Mille Lacs Air is a Federal Class II, 11 MLBS §119 requires treatment of Mille Lacs Air "Pursuant to Class I". Requested Action: Consider comment; edit figure and/or text as warranted.	The Mille Lacs Reservation is not federally recognized by the EPA as a Class 1 area.	Resolved. Requested Action: None.
698	17.a	2063				"MPCA Risk Assessment Screening Spreadsheet" should be fully identified as "MPCA Air emissions risk analysis (AERA) Risk Assessment Screening Spreadsheet (RASS)(aq9-22)" Requested Action: address comment. Edit text as necessary	Thank you for your guidance.	Resolved. Requested Action: None.
699	6.b	2068				The railway spur will need to be evaluated against the ambient air boundary. Requested Action: Advisory only.	Comment is noted.	Resolved. Requested Action: None.
700	17.a	2075				Will vehicle emissions be included in air modeling that is used to support a health risk assessment? Requested Action: Answer question. Future topic of discussion for treatment of health issues in development of Draft Scoping Decision Document.	The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.
701	17.a	2075				Pursuant to the question about dust and odors and the effects thereof on sensitive receptors and quality of life, briefly discuss how health risk assessment will be used to address fugitive dust and odors. Requested Action: Answer question. Future topic of discussion for treatment of health issues in development of Draft Scoping Decision Document.	The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.
702	6.b	2080				All vehicle emissions above and below ground will need to be included in the various air quality impact reviews. Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
703	17.b	2080				Include emissions from trains. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
704	17.b	2080				What about emissions from possible use of propane or natural gas powered vehicles? Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	Off-highway mobile equipment will be evaluated.	Comment 704 has not been addressed. Include brief discussion on possible non-electric/non-diesel vehicle use (such as propane and/or natural gas-powered vehicles), and their non-road emissions.

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								Requested Action: No action necessary.
705	17.c	2092				Dust and Odors section did not mention nearby sensitive receptors/quality of life impacts. Sensitive receptors should be identified/referenced as well as whether they could be expected to experience dust/odor impacts. Requested Action: Answer question. Future topic of discussion for treatment of community health issues in development of Draft Scoping Decision Document.	The Project will address this question, as necessary, in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
706	17.c	2094				How would the overburden and construction-related materials piles be kept safe from wind erosion? Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	Stockpiles will meet MN Permit to Mine rules under Minnesota Rules, chapter 6132.2400 Storage Pile Design. A variety of methods may be utilized to control fugitive dust which will be further evaluated in the EIS.	Comment 706 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: No action necessary.
707	17.c	2097				A Fugitive Dust Control Plan is forthcoming in EIS. No dust control plan prepared yet. Recommend review of NIOSH Dust Control Handbook for Industrial Minerals Mining and Processing (NIOSH, 2019) in preparation of your Fugitive Dust Control Plan. Plan for sampling and analysis of types and quantity of fugitive dust has not been presented. Requested Action: Note comment. A Fugitive Dust Control Plan will be presented in the EIS.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
708	17.c	2105				Will there be monitoring or confirmation testing that the air is being scrubbed sufficiently of dust and particulates? What specific standards will be applied when determining if suspended dust/particulates have been sufficiently reduced? Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	Required compliance air monitoring procedures will be determined during the permitting process. The Project will meet the Clean Air Act ambient air quality standards.	Not Resolved. If monitoring/mitigation/dust control methods are not yet determined, state when those decisions will be made (i.e. permitting process) and what will inform those decisions. Stating within the document which specific standards will be met is useful too (i.e. Clean Air Act ambient air quality standards). Requested Action: Add text to address comment.
709	17.c	2107				Describe visible emission inspection procedure. Describe specific location, frequency, and method for inspections (example: daily fence line measurements using PM2.5 instrumentation) Requested Action: Note for Fugitive Emissions Plan in EIS	Required compliance air monitoring procedures will be determined during the permitting process. The Project will meet the Clean Air Act ambient air quality standards.	Resolved. Requested Action: None.
710	17.c	2109				Describe frequency of dust suppressant application. Describe criteria for use of additional chemical dust suppressants, if needed. Requested Action: Note for Fugitive Emissions Plan in EIS	Specific procedures related to dust suppressants for fugitive emission controls will be addressed in the fugitive dust control plan created for permitting.	Resolved. Requested Action: None.
711	6.b	2117				Peat wetlands are an important carbon store. Draining them and/or using peat as soil amendments where it can decompose releases carbon dioxide. Assessment of land use change based GHGs should include disturbed peatlands.	The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.

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						Requested Action: Edit document as needed to address comment. Further discussion of issue for treatment in Draft Scoping Decision Document.		
712	23	2117				Would the lifetime GHG emissions include the 1-2 years of construction + 10 years of operation + ?? Years for closure. A timeline discussion would be valuable here. Requested Action: Answer question.	The Project looks forward to future discussions on this topic and will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.
713	18.a	2123				Odors from water treatment and the storm water pond should be considered within this section. Requested Action: Consider comment; edit figure and/or text as warranted.	The Project looks forward to future discussions on this topic and, if necessary, will address this question in the EIS.	Resolved. Requested Action: None.
714	18.a	2140	15			Cement production is a major source of Greenhouse Gases. The project proposes to use substantial amounts of cement for the CRF. Cement manufacturing should be included in the GHG budget. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
715	18.a	2141	15			Evaluate impacts of removing peat lands on carbon sequestration. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
716	18.a	2148				"a. GHG Assessment" should be "b. GHG Assessment" Requested Action: Edit EAW	Document has been revised to correct this typographical error.	Resolved. Requested Action: None.
717	18.b.i	2148				Only include mitigation measures that were purposely intended to mitigate for greenhouse gas emissions in the list of mitigation measures. Measures such as minimizing the use of uncemented backfill, which were not primarily intended to mitigate for greenhouse gas emissions, should not be included in the list of mitigation measures. Also, it is unclear how biosolids applications will mitigate for GHG emissions. Requested Action: Consider comment; edit text as warranted.	The Project looks forward to future discussions on this topic. At this time, the Project believes that all the measures included on this list would be meaningful mitigation measures to address greenhouse gas emissions. Many of these measures would have other positive effects in addition to GHG mitigation, and it is not clear at this time whether the GHG mitigation effect would be the "primary" benefit intended for their implementation compared to other positive effects. Biosolids applications has been removed from the list of GHG mitigation measures.	Resolved. Requested Action: None.
718	18.b.i	2149				Other aspects of construction should be discussed in this section. Have emissions from temporary water treatment and emergency generators been considered in the GHG calculations? Requested Action: Consider comment; edit text as warranted.	These items would be included in the GHG emission source categories listed on lines 2127 and 2131 of the initial Project Description. The Project will further address this question, as necessary, in the EIS.	Resolved. Requested Action: None.
719	18.b.i	2150				Define feasibility criteria. Requested Action: Consider comment; edit text as warranted.	Please provide additional detail or specifics to help clarify the question.	Comment 719 has not been addressed. List of GHG mitigation measures are provided, but it says "apply... when feasible". What are the Project's criteria to have the measures be

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								considered "feasible" to apply? Requested Action: Consider comment; modify text as warranted.
720	18.b.i	2150				The EIS should to identify all possible GHG mitigation alternatives (e.g., on-site production of renewable energy). Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
721	18.b.i	2150				For mitigation measures, the EIS needs to include, at a minimum, the GHG emissions for transporting the ore to the processing facility so that a meaningful comparison can be made with the alternative of processing ore on-site. To the extent that ore processing on-site would result in materially different GHG emissions than a comparable processing facility in North Dakota, that information also should be evaluated. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
722	18.b.i	2163				Where would biosolids applications occur and what would the source of biosolids be? Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	Biosolids applications has been removed from the list of GHG mitigation measures.	Resolved. Requested Action: None.
723	18	2163				Would this be land application from the water treatment plant or the peat relocation? Depending on the product and use, this could require a Land Application Permit (not listed in Section 9). More information and elaboration on this is needed. Requested Action: Respond to comment; edit document as needed.	Currently there are no plans to land apply peat or water treatment plant residuals. The Project will address this issue, as necessary, in the EIS.	Resolved. Requested Action: None.
724	18.b.iii	2169				What options are available to further reduce the project-related GHG emissions beyond the Next Energy Act Goals? Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	The Project will address this question, as necessary, in the EIS.	Comment 724 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
725	18.b.iii	2173				GHG emissions from water treatment should be considered and discussed in this section. Requested Action: Consider comment; edit text as warranted.	The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.
726	6	2179				DNR notes the Draft Scoping Decision Document would likely account for the numerous stationary and mobile noise sources in models of daytime and nighttime activity, with results required to be compared with measured daytime and nighttime noise levels (to assess increase over existing and potential annoyance) and MPCA daytime and nighttime Noise Standards to address compliance with MPCA noise standards. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document and noise/vibration impact assessment work plan.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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727	6.b	2179				<p>The assessment of potential noise impacts should recognize that explosives are detonated underground (as noted in Item 6b at Lines 358-396), and in particular predict any potential for surface noise impacts.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
728	19	2179				<p>Noise is discussed but not vibration from blasting. Maps with contour lines for both noise and vibration are needed for the project. Analysis of effects of vibration on wells, houses, etc. is needed.</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>This topic will be addressed further during the EIS. See Response to Comment #109 for additional information.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
729	19	2179				<p>Are noise impacts to wildlife considered?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	<p>This topic will be addressed as necessary during the EIS.</p>	<p>Comment 729 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
730	19	2179				<p>What if the pre-established barrier or the additional natural barrier fails (due to blowdown, wildfire, pest infestation, disease, etc.), what other sound control measures will be used?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	<p>This topic will be addressed as necessary during the EIS.</p>	<p>Comment 730 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW.</p> <p>Requested Action: None.</p>
731	19	2185				<p>The characterization of existing noise environment at nearest noise-sensitive parcels does not accurately describe the outdoor soundscape of the remote, isolated, scattered homes nearest the project site.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>The Project looks forward to future discussions on this topic, which would be further addressed as necessary in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
732	19	2187				<p>Nearby sensitive receptors should be specifically identified with their distances to project boundaries indicated. Inclusion of a figure/map showing locations and distances would add clarity.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>This topic will be addressed as necessary during the EIS.</p>	<p>Resolved</p> <p>Requested Action: None.</p>
733	6.b	2190				<p>The TBM operations should be added to the equipment that could contribute to noise and vibration effects of note. // The potential for the TBM's operations to generate dust effects should be noted.</p> <p>Requested Action: Consider comment; modify text to address the issue. The Draft Scoping Decision Document could identify TBM operations as a potential source of noise and vibration impacts to humans and wildlife. Similarly, Draft Scoping Decision Document could identify TBM as source of dust impacts to humans and wildlife.</p>	<p>Section 19 of the document has been updated to include the TBM.</p>	<p>Resolved</p> <p>Requested Action: None.</p>

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734	19	2191				<p>Noise impacts of blasting and TBM operation should be discussed in detail.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>TBM tunneling has been preferred and successfully used in dense urban areas (e.g., downtown New York and Los Angeles). TBM tunneling is selected for these projects in part because of strict noise and vibration limits that are difficult to comply with using other methods.</p> <p>The rock breaking mechanism of a TBM is based on disc cutting tools continuously rotating against the face, not involving any high energy and repeated impact typical of other mechanical excavation means. As a further mitigation measure, TBM cutterhead rotation and advance speed can be reduced in more sensitive areas, with shallow ground cover. In consideration of the depth of the rock section of the tunnel (greater than 130 feet deep) and damping effect generated by the thick soil layer above it, we do not anticipate perceivable noise and vibrational effects to the area. In any case, construction will be in compliance with local/state/federal ordinances.</p> <p>See Response to Comment #109 regarding blasting.</p> <p>These items will be evaluated in further detail for the EIS.</p>	<p>Resolved</p> <p>Requested Action: None.</p>
735	19	2195				<p>The noise analysis should be performed by a qualified acoustician with demonstrated expertise using modern ISO9613-based environmental noise modeling software. The noise analysis should evaluate compliance with MPCA Noise Standards, and also changes in the quiet rural soundscape. The methodology used to measure existing noise levels should be based on ANSI/ASA s3/sc1.100-2014 ANSI/ASA S12.100-2014 (R2020) Methods to Define and Measure the Residual Sound in Protected Natural and Quiet Residential Areas.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
736	19	2200				<p>FRA methods should be used to evaluate noise from project-related trains, and project-related noise on local railways. Ideally this would be included in the models of stationary and mobile noise sources.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>
737	19	2200				<p>The noise analysis should model stationary and mobile noise sources using spectral noise emissions data and a three-dimensional noise modeling software product that utilizes ISO9613 propagation equations, and not use a spreadsheet-based noise model. CadnaA and Sound plan are two software-based noise models that are appropriate for modeling noise from stationary and mobile noise sources on the project site, and also the proposed railroad. FHWA TNM should be used to evaluate project-related traffic.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>The Project looks forward to future discussions on this topic ultimately leading to the RGUs determinations for what items and methods acceptable for use in the EIS.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD and EIS.</p> <p>Requested Action: None.</p>

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738	19	2200				At a minimum there should be daytime and nighttime noise models for construction, operation, and closure. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
739	19	2200				The EIS should evaluate construction noise levels using FHWA/FTA methods that identify equipment and noise levels used during each phase of construction and closure. The assessment of noise from construction and closure should be detailed and reflect actual equipment likely to be used. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
740	19	2203				Project-related noise is subject to Minnesota Noise Standards. Requested Action: Advisory	Comment is noted.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
741	19	2205				Considering wild rice waters in the vicinity of the project, a description of how far the sounds of mine, including blasting, could be heard would be helpful. Requested Action: Address comment; modify text as warranted.	The Project will address this issue, as necessary, in the EIS. Also see Response to Comment #109 for additional discussion regarding blasting.	Resolved at this stage. To be discussed in development of the SEAW/DSDD and EIS. Requested Action: None.
742	19	2205				Potential noise reduction associated with vegetated strips does not correctly reflect what Reference 50 says. Reference 50 oversimplifies acoustical absorption by vegetation and is not an appropriate reference for this project. Requested Action: Address comment; modify text as warranted.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
743	19	2208				Details of various barrier options should be discussed as well as why chosen option(s) were selected over others (e.g. trees vs berm etc..). Requested Action: Address comment. Future discussion topic	The Project looks forward to future discussions on this topic and will address this issue, as necessary, in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD and EIS. Requested Action: None.
744	20.a	2212				The document states: "Due to the rural nature of the Project location, alternative transportation modes are not available." This is likely incorrect as alternative transportation modes are available (e.g., Arrowhead Transit, taxi services, ride-share services, etc.), however those modes of transportation are not practical or feasible, due to lack of service frequency or the high cost of using those services. Requested Action: Consider comment and edit document.	The Project does not consider these to be viable methods of alternative transportation to the site for construction and operations purposes. There are no rideshare services or taxis within 30 miles. Arrowhead Transit is not a practical solution to transport workers on regular schedule.	Comment 744 has not been addressed. Change "alternative transportation modes are not available" to "alternative transportation modes are impracticable". Requested Action: Modify text to address comment.
745	20.a	2212				The project description for the EIS will require greater detail around the proposed rail shipment of ore to the concentrator. Requested Action: Advisory only. Future discussion item for development of the draft scoping decision as the detail is needed to support the impact assessment.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
746	20.a	2212				"Future parking would consist of approximately 160 spaces." So, will the parking lot be surface be permeable or	The Project will address this issue, as necessary, in the EIS.	Comment 746 has not been adequately addressed in the EAW but has been adequately

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						impermeable surface for the bulk stormwater runoff? Requested Action: Answer question.		addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: No action necessary.
747	20.a	2217				If known include a brief description of volume of any Oversize / Overweight (OSOW) and/or truck volumes during construction and operation. Requested Action: Edit text with detail as currently known.	Oversize / Overweight (OSOW) trucks will not be a regular occurrence once the mine is in operation. During construction phase there will be both permanent equipment deliveries and construction equipment deliveries that may be Oversize / Overweight (OSOW). Further details are not available currently.	Resolved Requested Action: None.
748	6.b	2231				Back at Item 6b at Lines 569-595, there will be both outgoing shipment of ore and returning empty railcars, plus potential incoming shipment of aggregate, all of which represents and increase in rail traffic over existing conditions. Estimates of this increase in rail traffic should be restated here. Requested Action: Edit document as indicated. Future discussion item in development of Draft Scoping Decision Document.	The Project will address this issue, as necessary, in the EIS.	Comment 748 has not been adequately addressed in the EAW but has been adequately addressed in the response to the initial EAW's review comments. Please concisely restate the response in the revised EAW. Requested Action: None.
749	21.a	2255				RGU notes that it remains to be determined what project impacts would operate at a geographic scale and timeframe that may interact with other projects, including land management activities. Requested Action: Advisory only; the issue will be explored over the development of the scoping EAW and Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
750	21.a	2255				RGU notes that even though current condition typically provides a good representation of past actions or activities, it may be necessary to detail previous development. Requested Action: Advisory only; the issue will be explored over the development of the scoping EAW and Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
751	21.a	2258				The EIS scope may include discussion of the surrounding community, its sociodemographic, environmental justice, and human health issues. Requested Action: Advisory only; future discussion item in development of the Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
752	21.a	2266				RGU notes consideration may be given to adding tribal lands and ceded territories. Requested Action: Advisory only; future discussion item in development of the Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
753	21.b	2271				The document states: "At this time there are no other known projects within the vicinity that may interact with the proposed Project." DNR as RGU will independently assess the potential for the proposed project to interact with any reasonably foreseeable future projects (for which a reasonable basis of expectation has been laid). This is necessary for all mining actions as it is common for potential resource exploitation to	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

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						extend into neighboring lands over extended timeframes. Requested Action: Advisory only; future discussion item in development of the Draft Scoping Decision Document.		
754	21.b	2274				A potential area of cumulative effects could involve mercury impairments and how both Premier Horticulture and Talon propose to address potential additional loading of mercury to already impaired waters. Requested Action: Advisory only; future discussion item as potential impacts are better understood in development of scoping documents.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
755	21.b	2279				As noted in Item 6b at Lines 894-898, the RGU will be required to consider whether other reasonably foreseeable actions meet EQB's guidance as future mining activity requiring consideration for potential cumulative effects. Requested Action: Advisory only; future discussion item as potential impacts are better understood in development of scoping documents.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
756	21.c	2281				Scoping could include consideration the potential for the project to result in community-scale health effects to Native American and local populations. Requested Action: Advisory only; future discussion item as potential impacts are better understood in development of scoping documents.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
757	21.c	2284				The RGU agrees that identifying Premier Horticulture's Wright Bog Project constitutes a project whose impacts could interact with those of the proposed project. Requested Action: Advisory only; future discussion item as potential impacts are better understood in development of scoping documents.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
758	22	2293				Scoping could include consideration of Environmental Justice issues that may be associated with the project. Requested Action: Advisory only; future discussion item as potential impacts are better understood in development of scoping documents.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	#REF!
759	23	2306				Including the NI43-101 report as a reference and cited within the EAW would be beneficial. Requested Action: Address comment and update EAW as appropriate.	The Project only included references for sources used in the writing of the document. EAW was edited to include: "(Only references cited in the EAW data submittal were included in the reference list.)"	Follow-up: There should be a significant amount of applicable information from the 43-101 report that would be of value here and is citable. Requested Action: Add text to address comment.
760	23	2306				Should add the following reference Current Records -- Map -- https://osaportal.gisdata.mn.gov/CurrentRecordsMap -- July 1, 2023	The Project only included references for sources used in the writing of the document.	Resolved. Requested Action: None.

Comment No.	EAW Section	EAW v1 Starting Line No.	Table	Figure	Graphic	Round 1 Comment and RGU Requested Action 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Requested Action 2/5/2024
						Requested Action: Edit document.		
761	23	2306				Should add the following reference Tribal Directory Assessment Tool -- https://egis.hud.gov/tdat/ -- July 1, 2023 Requested Action: Edit document.	The Project only included references for sources used in the writing of the document.	Resolved. Requested Action: None.
762	23	2306				Should add the following reference -- National Register of Historic Places -- Database Research -- https://www.nps.gov/subjects/nationalregister/database-research.htm -- July 1, 2023 Requested Action: Edit document.	The Project only included references for sources used in the writing of the document.	Resolved. Requested Action: None.
763	23	2391				A discussion regarding the increase of traffic and rail usage to the area should be discussed within the cumulative impacts section in association to GHG and air emissions. Requested Action: Advisory only; future discussion item in development of the Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
764	6	General				DNR notes the description does not provide enough information to identify location of project features on a map or aerial photo, which will be needed to determine where noise- and vibration-sensitive land uses are located relative to the proposed project site. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document and noise/vibration impact assessment work plan.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
765	13	General				Risk assessment is an important tool for developing waste management programs for hazardous and non-hazardous wastes. Risk assessment information can be used to inform waste minimization programs, support applications for operating permits, and assess the need for cleanup actions, including setting cleanup goals. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.
766	15	General				The cultural resources inventory report should include a comprehensive and near-exhaustive overview of the prehistoric/protohistoric, early historic, and historic developments in the Tamarack region. The text should also note that the National Register-listed Sandy River Lumber Company Horse Barn is located south of Tamarack. Exact location of the property in relation to the project area will need to be provided. Requested Action: Address comment. Modify text as needed. Future discussion topic for Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.
767	16	General				A discussion regarding DNR Visual Sensitivity Classification should be included for the project area and adjacent land. Requested Action: Answer question. Edit text as necessary	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.

Comment No.	EAW Section	EAW v1 Starting Line No.	Table	Figure	Graphic	Round 1 Comment and RGU Requested Action 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Requested Action 2/5/2024
768	17	General				<p>Fugitive Dust and Particulate Matter are considered but, are there concerns regarding parameters of concern (CO, NOx, etc..) and will these need treatment prior to emission release?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>
769	17	General				<p>This section of the EAW is problematic in that it covers air emissions from only stationary sources and mobile sources, and from dust and odor. There is no spot to explore other anthropogenic emissions, nor a way to quantify biogenic emissions. Since explosives are not stationary sources or mobile sources, though they may generate dust and odor, the EAW makes no room to address emissions from these explosives. The EAW should include this so that we can better evaluate the Project.</p> <p>Requested Action: answer question, modify text, if needed</p>	<p>Explosives can be treated as a stationary source since all mine emissions/odors will exit via the Mine Exhaust Stacks. The Project will look to the RGU for further guidance.</p>	<p>Not resolved. While it is noted how explosives will be treated, it was not explained how any other anthropogenic and biogenic emissions would be treated.</p> <p>Requested Action: Add text to address comment.</p>
770	18	General				<p>All discussions regarding mobile sources so far has not discussed emissions from increased rail traffic.</p> <p>Requested Action: Include discussion on emissions from rail</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Comment 770 has not been adequately addressed. Change "mobile source emissions;" to "mobile source emissions such as from trucks, trains, and construction equipment;" for clarity.</p> <p>Requested Action: Modify text to address comment.</p>
771	21	General				<p>The EIS scope may include assessment of potential impacts to the uses in and around the proposed project area including Treaty rights (e.g., wild rice harvest), hunting and gathering (foraging), and recreation.</p> <p>Requested Action: Advisory only; future discussion item in development of the Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Follow-up. Review how comment addressed in development of DSDD.</p> <p>Requested Action: Advisory</p>
772	All EAW	General				<p>There is no mention of Ecosystem Services Valuation in the EAW document. EIS Scoping should address Ecosystem Services Valuation in detail.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document. Likely considered as part of socioeconomic analysis.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>

Round Two New Comments Table

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
773	5	44				Add the USGS 8-digit Hydrologic Units for the Watershed (HUC-8 #07010103) for the Mississippi River - Grand Rapids watershed. Requested Action: Add text to address comment.
774	5	49	2			For Latitude and Longitude, for consistency in indicating precision, please have all decimal degrees go to the 5th decimal place, as decimal degrees to the 4th decimal place implies less precision. Requested Action: Add text to address comment.
775	5	49	2			List the Tax Parcel Numbers in numeric order. Requested Action: Modify text to address comment.
776	5	188				Add "MnDOT Minnesota Department of Transportation" Requested Action: Modify text to address comment.
777	6.a	238				For the underground mine area, where does the EAW discuss the proposed size, including depth in three dimensions? Requested Action: Answer question and add text as warranted.
778	6.b	268				Within the State of Minnesota, how many surface acres of roadway and railway will be used during construction and operations by heavy trucks and railcars within the State of Minnesota? Requested Action: Answer question; modify text as warranted.
779	6.b	268				Are waste rock and overburden stockpiles included in the new developed surfaces 77.6 acres? What is included in "temporary construction laydowns and staging areas"? Requested Action: Answer question and add text as warranted.
780	6.b	287				The acreage of the proposed site may be insufficient to store mine wastes and contact water. Requested Action: Advisory only.
781	6.b	289				The submitted site plan covers 60.5 acres for the mine site facilities to contain waste rock, overburden, stormwater treatment, mine access, loading, air filtration while maintaining safe operation. DNR will monitor this estimate over the course of the EIS if the estimate of acreage proves to not be adequate. Requested Action: Advisory only.
782	6.b	290				RGU notes that there will be peat soil disruption due to rail spur construction. Alternatives for ore transport will likely be explored in the development of the EIS. One consideration could be moving to existing roadway. Requested Action: Advisory
783	6.b	299				Will there be equipment staged off the project area? What maneuvering of equipment for management of waste rock, overburden, and loading would be staged in the project area? Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
784	6.b	312				How are the 159.3 acres of potential temporary uses evaluated in terms of land use and fugitive air emissions impacts? Requested Action: Answer question; modify text as warranted.
785	6.b	312	3			No time limit is defined for "temporary" in use of 159.3 acres for additional staging. Requested Action: Consider comment; modify text as warranted.
786	6.b	312				The term "temporary" for "construction laydown and other potential temporary uses" is not defined. Please specify the timing meant by "temporary" in this context. Requested Action: Modify text for clarity.
787	6.b	315	1			Graphic 1 has facilities but labels only site features. Label all facilities on the site shown in the graphic. Requested Action: Modify text to address comment.
788	6.b	315	1			The topsoil and backfill stockpiles appear immediately adjacent to the railway. Please explain the scale of these and the distances between them and the rail. Requested Action: Consider comment; modify text as warranted.
789	6.b	320	2			Graphic 2 has no labels or scale. Add them to the graphic. Requested Action: Modify graphic to address comment.
790	6.b	324				Will the transported ore also contain sulfur? Requested Action: Answer question; modify text as warranted.
791	6.b	324				Talon plans to extract ore at a rate of up to 800,000 short tons (2,000 lbs./short ton) per year but does not cite how much total rock will be extracted. Requested Action: Consider comment; modify text as warranted.
792	6.b	324				How is infrastructure cost, including transport and new plant in North Dakota, economically supported by a mine extracting no more than 8 million tons of ore? Need both economic feasibility analysis and independent economic review, including analysis of future mining that might support infrastructure costs. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
793	6.b	335				Crushers are more accurately used for preparing waste rock and aggregate to be backfill, not "backfill materials." Please provide clarity regarding waste rock and backfill, including additional materials to form the Cemented Rockfill. Requested Action: Consider comment; modify text as warranted.
794	6.b	335				What volume and class are the rock being crushed? Requested Action: Answer question; modify text as warranted.
795	6.b	336				Revised EAW excludes Cemented Backfill Plant. How will crushed materials be used as backfill? What cement plant would be used? Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
796	6.b	337				Revised EAW removes enclosed rail loadout and only ore is stored within a building. Where would rail cars be loaded with ore? What is the volume and building storage capacity for ore? Requested Action: Answer question; modify text as warranted.
797	6.b	338				List of facility elements lists "Ore storage building" but that term is not used anywhere else in the EAW; however, "Ore storage and railcar loadout" is used numerous times in the document. Please use either one description or the other. Requested Action: Consider comment; modify text as warranted.
798	6.b	339				The revised EAW removes the railway yard for railcar storage. Would there be no storage of railcars? Requested Action: Answer question; modify text as warranted.
799	6.b	345				"Backfill materials stockpile" is the improper term affecting waste management. Waste rock stockpiles require evaluation and management under Minnesota Rules 6132.2400 and, potentially, 6132.2200 as reactive mine waste. Any stored aggregate has different (lesser) management requirements. Requested Action: Consider comment; modify text as warranted.
800	6.b	347				Facility elements lists "Topsoil stockpile" but the EAW has no description for it. Add description. Requested Action: Edit text as requested.
801	6.b	361				The expected mine life at the time of the EIS data submittal is no less speculative than it is today. The operating costs and prevailing metal prices may change significantly from the EIS data submittal to any permits being issued. The analysis should include a full range of expected mine-life, from the shortest to the longest possible mine life. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
802	6.b	361				What testing has been done for environmental review (e.g. waste characterization, hydrology and hydrogeology, bulk sample humidity testing, water quality treatment pilot study, mesocosm testing of sulfate impacts, testing of proposed liners, air dispersion modeling)? Requested Action: Answer question; modify text as warranted.
803	6.b	363				Explain what "market conditions" would determine actual mine life. Where is documentation of operating costs and market pricing to support economic feasibility of proposal? Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
804	6.b	366				Has the proposer been using the "septic systems and/or leach fields" that will be removed in construction? Requested Action: Answer question; modify text as warranted.
805	6.b	368				Existing vegetation would be removed as needed. Explain what wetlands/peatlands would be removed and where and how stored? Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
806	6.b	372				Define "mobile or modular water treatment plant for initial tunneling" and provide information regarding volume, parameters, and/or the nature of treatment. Requested Action: Add text to address comment.
807	6.b	372				What volume of water and parameters requiring treatment would result from tunneling? Requested Action: Answer question; modify text as warranted.
808	6.b	377				What consideration has been given to constructing the rail spur on an elevated track that would permit water to flow under the track unimpeded? Requested Action: Answer question; modify text as warranted.
809	6.b	378				Estimate volume-mass of peat to be removed. What is the fill material? Depending on the amount of peat removed, this could be considered a loss of ecosystem functions such as carbon storage, and biological diversity. Requested Action: Answer questions; modify text as warranted.
810	6.b	380				Where will project require pilings due to "areas of deeper peat"? Requested Action: Answer question; modify text as warranted.
811	6.b	383				Change "may" to "would" for consistency. Requested Action: Edit text as requested.
812	6.b	383				Explain how railway features can be constructed to enable water flow. Requested Action: Answer question; modify text as warranted.
813	6.b	383				How many acres of wetlands/peat will be excavated or impacted due to railway spur construction? Requested Action: Answer question; modify text as warranted.
814	6.b	383				EIS should require a hydrologic analysis to determine how a change in where the water flows from one side of the rail spur to the other may result in increased ponding on the up-gradient side and drying on the down gradient side. Flow across the developed surface could also increase the potential for contamination. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
815	6.b	388				Evaluate sufficiency of breathable air for workers. Will particulates and dust be released from portals as well as from "stacks"? Requested Action: Answer question; modify text as warranted. Potential Discussion item in development of the Draft Scoping Decision Document
816	6.b	394				Photo of portal from Eagle Mine. Does not seem to reflect tunnel boring machine (TBM) construction. Replace image with one that reflects TBM. Requested Action: Modify text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
817	6.b	397				The EAW is missing a discussion on the feasibility of the TBM tunneling angle at the far point of the loop where tunneling would appear to be in bedrock (proximate to ore excavation drifts). Requested Action: Consider comment; modify text as warranted.
818	6.b	397				What is depth of mine workings? Requested Action: Answer question; modify text as warranted.
819	6.b	397				Where are the ventilation exhaust drifts in relations to the TBM loop? Requested Action: Answer question; modify text as warranted.
820	6.b	397				Where is location on map of wetlands and other features of proposed tunnel and blasting? Requested Action: Answer question; modify text as warranted.
821	6.b	399				Portal tunnel would extend to top of ore body. Clarify depth, locations of shallowest blasting. Requested Action: Consider comment; modify text as warranted.
822	6.b	409				The EAW states the TBM tunnel would extend to a depth of approximately 350 ft, with 130 feet going through unconsolidated sediments and deeper portion through bedrock to 350 ft. Please confirm that the TBM would penetrate up to 220 ft of bedrock. What projects are comparable in terms of penetrating bedrock? Requested Action: Answer question; modify text as warranted.
823	6.b	417				Explain excavation support system, including nature of overburden, sediments, and rock and nature of supports. Provide amount and method of calculation for groundwater infiltration. Requested Action: Consider comment; modify text as warranted.
824	6.b	420				EIS must have an analysis of effects of mine blasting on 10–12 inch concrete liner under similar use and conditions. Requested Action: Advisory only.
825	6.b	420				How would precast concrete liner 10–12 inches thick be permanently maintained under groundwater and overburden pressure in the presence of sulfate chemistry? Requested Action: Answer question; modify text as warranted.
826	6.b	420				Why is the tunnel liner "permanent" if the life of mine is only 7 to 10 years? The reason for this permanency must be stated. Requested Action: Answer question; modify text as warranted.
827	6.b	423	5			Provide meaningful scale to Graphic 5. Without a scale, this graphic is not meaningful. Requested Action: Modify graphic to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
828	6.b	426				Photo shows pressurized-face TBM used in Nice, France. However, the Nice tunnel was dug through soils, sand, and gravel. Does not demonstrate use of TBM through bedrock. Requested Action: Consider comment; change image as warranted
829	6.b	442				Describe how the grouting process would be executed to fill voids between the lining and soil/rock. Requested Action: Consider comment; modify text as warranted.
830	6.b	449				Is this Bessac diagram intended to represent TBM through bedrock for mining? It appears to be a light rail. Requested Action: Answer question; modify text as warranted.
831	6.b	463				Why is the overburden stockpile (temporary) proposed to be unlined? How temporary is temporary? This assumes that quaternary deposits as deep as 350 feet would have a constituent load allowing their use in construction. No basis was cited for that assumption. Requested Action: Consider comment, answer questions, and modify text as warranted.
832	6.b	463				RGU notes that the issue of surface overburden management will require detailed evaluation in the EIS. Areas of investigation will likely include: volume; composition; geochemical characterization; and suitability for some type of future beneficial re-use. Need for longer-term storage, for whatever reason, could require more acreage than currently projected. Requested Action: Advisory.
833	6.b	465				The correct term is "waste rock", which is reactive mine waste under Minnesota Rules 6132.2200. Any aggregate storage would be separate. The volume of waste rock, degree of segregation based on chemical composition, and likely timing before removal for crushing and backfill all need to be explained in the EAW to determine whether surface site acreage is sufficient and safe. Requested Action: Modify text to address comment.
834	6.b	472				Temporary water treatment (mobile or modular units) would be used as necessary is imprecise as to volume and parameters. Permanent water treatment plant construction may be required prior to mine tunneling depending on treatment volume and levels of contaminants. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
835	6.b	472				Sulfide ore mining waste rock seepage and TBM chemicals may not be easily treatable. Water quality is more likely to be protected if treatment train is piloted, built, and tested before any tunneling begins. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
836	6.b	472				The EAW says modular units can treat a "wide variety of parameters". These parameters seem to be known to the proposer and should be disclosed in the revised EAW to inform the scoping. Requested Action: Consider comment; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
837	6.b	474				How much water will be used by the TBM per hour of operation, and of that, how much will be captured and reused if any? Requested Action: Answer question; modify text as warranted.
838	6.b	475				To the extent there is water introduced by the TBM methodology that is not captured and reused, where will it be located? Requested Action: Answer question; modify text as warranted.
839	6.b	475				What is the chemical characteristic of the water captured and reused? Requested Action: Answer question; modify text as warranted.
840	6.b	475				What is the chemical characteristic of the water not captured and reused? Requested Action: Answer question; modify text as warranted.
841	6.b	475				What is the source of the TBM generated water? Requested Action: Answer question; modify text as warranted.
842	6.b	475				The term "Backfill materials stockpile" only occurs here without being defined. Change it to a term used throughout the rest of the EAW for consistency. Requested Action: Consider comment; modify text as warranted.
843	6.b	476				EAW states certain TBM facilities "are intended to also serve a permanent function for mine operations." Unclear what is being referenced in the text. Provide examples of what components would serve a "permanent function." Unclear also what "permanent" means in this usage? Requested Action: Answer questions; modify text as warranted.
844	6.b	480				Metro light rail tunnel was similar width. Did it involve peatlands, bedrock, acute angles of construction? Was it subjected to vibrations from blasting after construction? Requested Action: Answer question; modify text as warranted.
845	6.b	480				DNR notes that proposed use of the TBM may require documentation for EIS on feasibility of proposed application to ensure understanding of potential impacts. Requested Action: Advisory only.
846	6.b	480				How many miles of tunnel are proposed to be created by the TBM methodology at Tamarack? What are the comparative lengths of the tunnels created by TBM methodologies shown here as examples? Requested Action: Answer question; modify text as warranted.
847	6.b	483				Identify which if any of the example tunnels spiraled in a corkscrew manner beneath their surface portals like the one proposed at Tamarack and which ones were mostly perpendicular and mostly at the same elevation as their portals. Requested Action: Consider comment; modify text as warranted.
848	6.b	483				EAW does not specifically state shallowest depth of drill-and-blast methods. Confirm that shallowest mining will be 300 feet below surface. Requested Action: Consider comment; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
849	6.b	483				DNR notes that the alternatives process could include consideration of more conventional means of tunneling than currently proposed through use of the TBM. Requested Action: Advisory only.
850	6.b	483				Draft EAW claims that conditions for TBM methodology have been evaluated. Regulators need to see this analysis to inform the scoping of the EIS. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
851	6.b	496				Is there exposure if the TBM stalls or fails to penetrate rock? Requested Action: Answer question; modify text as warranted.
852	6.b	498				Draft EAW states that TBM "can" minimize groundwater inflow and surface settlement, reduce surface footprint. What are the risks? Requested Action: Answer question; modify text as warranted.
853	6.b	498				Will TBM tunneling use PFAs as it has at other sites? If so, how much? Requested Action: Answer question; modify text as warranted.
854	6.b	503				What chemical additives will be used in the TBM process? Are the chemicals different for borings through soils and through bedrock? Requested Action: Answer question; modify text as warranted.
855	6.b	503				Describe how the TBM methodology prevents rock fragmentation during the cutting process that lies outside the area that is encased by the lining. Requested Action: Add text to address comment.
856	6.b	509				Describe the individual fragmentation characteristics of each of the rock formations through which the TBM will tunnel, and how in each instance of rock type the cutter head will cut only a cleanly round, liner-sized hole rather than a fractured and ragged opening in the rock face. Requested Action: Add text to address comment.
857	6.b	509				EAW states TBM can achieve average advance rates greater than traditional excavation. What are factors determining if TBM will succeed and achieve predicted advance rates? Requested Action: Answer question; modify text as warranted.
858	6.b	513	40796			If the speculated CO2 sequestration project in the southern portion of the Tamarack Intrusive Complex is determined to constitute a reasonably foreseeable action, then any predicted increase in coincident seismic activity may constitute a potential cumulative effect requiring evaluation in the EIS. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
859	6.b	513				Underground development and mining after the initial TBM loop will be done with conventional drill-and-blast excavation methods. What is size, scale, and configuration of this initial underground mine project? Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
860	6.b	514				What vehicles and fuels are used for each stage of the mining cycle? Requested Action: Answer question; modify text as warranted.
861	6.b	518				Which, if any of the activities are automated (removing dislodged material, scaling, bolting, surveying) and which are not? Requested Action: Answer question; modify text as warranted.
862	6.b	518				Do the groundwater conditions under Tamarack include water under pressure? Requested Action: Answer question; modify text as warranted.
863	6.b	523				Should groundwater conditions be detected after probe holes are drilled, what will be the procedure used to contain or remove the groundwater? Requested Action: Answer question; modify text as warranted.
864	6.b	523				Revised EAW should provide information on quantity, vibrations, chemical releases associated with ANFO. Requested Action: Modify text to address comment.
865	6.b	528				The EAW does not explain why blasting would sometimes take place when there are personnel in the mine. Requested Action: Add text to address comment.
866	6.b	532				There is inadequate discussion of collection, treatment, monitoring of dust, gases, and particulates. HAPs and fine particles in the mine works and in exhaust will affect health of workers and community. Requested Action: Add text to address comment.
867	6.b	532				What amount of suspended dust and particulates would be released? Requested Action: Answer question; modify text as warranted.
868	6.b	534				What is the level of suspended dust and particulates the project Proposer consider to be acceptable for release? Requested Action: Answer question; modify text as warranted.
869	6.b	535				RGU notes that the level of particle reduction and the impact to nearby surface waters may be identified as in issue in the v1SEAW and explored in the development of the FSD. Requested Action: Advisory
870	6.b	551				The sources of electricity for charging electric vehicles must be considered in the evaluation of GHG impacts of the operation. Requested Action: Advisory only.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
871	6.b	551				<p>There is no quantification of how many tons of waste rock will be "mined" outside the ore body or the chemical characterization of such rock. This information affects project surface facilities and management of reactive mine waste.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
872	6.b	551				<p>If the Proposer does not select use of battery-electric vehicles as the proposed default type of mining equipment, then the EIS could make diesel-powered or other options as the proposed vehicle type. This may be determined in the alternatives process.</p> <p>Requested Action: Advisory only.</p>
873	6.b	554				<p>Revised EAW should disclose size and location of all underground development. Scale affects potential groundwater impacts and need for waste rock storage, as well as project economics.</p> <p>Requested Action: Add text to address comment.</p>
874	6.b	558				<p>If the proposer has data on faults, fractures, areas of known high inflow, they should provide detailed maps, with location on both a vertical and horizontal axis and quantification of inflow.</p> <p>Requested Action: Add text to address comment.</p>
875	6.b	582				<p>What is unique about modified drift-and-fill that minimizes "unintentional excavation of non-ore rock adjacent to targeted ore"?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
876	6.b	583				<p>The geometry is unclear. What is the depth and thickness of rock that will be mined in order to mine the "targeted ore"? How much rock will be excavated by the proposed project?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
877	6.b	583				<p>What tonnage and volume of "ore" and what tonnage and volume of "co-mingled dilution" is proposed to be transported by rail to North Dakota?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
878	6.b	587				<p>Replace conceptual image of mine with illustration of actual plan for mine and backfill.</p> <p>Requested Action: Modify graphic to address comment.</p>
879	6.b	593				<p>How is the "far extent of the ore is reached" determined given the scope and extent of the Tamarack Intrusive Complex? In what direction(s) is there an applicable far extent?</p> <p>Requested Action: Answer question; modify text as warranted.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
880	6.b	601				How will sulfur interact with the creation of Cemented Rockfill in the backfill plant on the surface, and with its transportation to the underground mine cavities by haul trucks? Requested Action: Answer question; modify text as warranted.
881	6.b	601				To what extent will the CRF and rocks used for backfill contain sulfur? Requested Action: Answer question; modify text as warranted.
882	6.b	601				The revised EAW should map the stopes that will be backfilled and at what year of mine operation. It is noted that if there is any resource in the direction of the stopes, it would not be customary to backfill until all potential mining is completed in that direction. Requested Action: Consider comment; modify text as warranted.
883	6.b	601				Prior EAW described project facilities to include a "cement backfill plant." References have been removed from some parts of EAW, but not from others. Is it intended that the site would include a cement backfill plant? Requested Action: Answer question; modify text as warranted.
884	6.b	602				Describe the process used to create Cemented Rockfill on the surface, the amount of water it requires, and the source of that water. Requested Action: Consider comment; modify text as warranted.
885	6.b	606				If Class 1 and 2 rock would be crushed to combine with cement for the backfill material, an explanation of the location of crushing and the cement plant, as well as the chemical parameters of waste rock and fines proposed to be used is required. Requested Action: Consider comment; modify text as warranted.
886	6.b	606				Basis for statements about "strengths required" and produced by this material is not provided. What industry standards are applied? What testing has been done of various materials? How will the concentration of sulfur in the rock affect the strength loss over time? Requested Action: Answer questions; modify text as warranted.
887	6.b	620				In addition to the CRF "tight" backfill, will bedrock pillars be retained within the mine works? Will there be any grouting of faults and fractures? Requested Action: Answer questions; modify text as warranted.
888	6.b	622				In addition to water level impacts, describe the size of the area (acres or square miles) in which there will be measurable changes in water levels. Requested Action: Consider comment; modify text as warranted.
889	6.b	625				RGU notes it is premature to determine that 0.2 in. deflection is negligible. Please clarify if the 0.2 in subsidence is an average across the whole mine area. If it is an average, describe the range and deviation. Requested Action: Consider comment; modify text as warranted.
890	6.b	625				How will groundwater and surface water levels be affected by the 0.2 inch deflection in surface subsidence of the 100 foot of overburden? Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
891	6.b	626				<p>If subsidence happens, what is the total surface area that potentially can experience this?</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
892	6.b	628				<p>Need to provide explanation and map regarding what are "instances where no additional mining will take place" and instances where additional mining will take place. Is CRF deemed unnecessary where no additional mining will take place adjacent to drift being backfilled?</p> <p>Requested Action: Add text to address comment.</p>
893	6.b	631				<p>What are "suspended solids filtered from the underground water handling systems? What are the concentrations of chemical parameters?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
894	6.b	631				<p>Would any method of lining or stabilizing chemistry of CRF, uncemented waste rock, or suspended solids from mine contact water be used?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
895	6.b	634				<p>The EAW states propane heaters would be used to keep intake air above freezing. The impacts on climate, emissions, and health for this should be analyzed. Would other heaters be used in the mine as well?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
896	6.b	635				<p>What is the geochemical and mineralogical identity of the dust and particulate that will be emitted into the atmosphere? At what volume levels during construction? During operation? During closure activities?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>
897	6.b	640				<p>RGU notes that the level of particle reduction and the impact to nearby surface waters may be identified as an issue in the v1SEAW and explored in the development of the Final Scoping Decision.</p> <p>Requested Action: Advisory</p>
898	6.b	640				<p>What levels of suspended dust and particulates would remain after filtration and scrubbing?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
899	6.b	640				<p>In regard to the filtration process, what are the standards to protect workers and the community from adverse health effects.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
900	6.b	643				<p>Explosives would be stored underground. How would they be contained and protected?</p> <p>Requested Action: Answer question; modify text as warranted.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
901	6.b	655				Have any mesocosm tests reflecting ecosystem effects been designed or implemented? Requested Action: Answer question; modify text as warranted.
902	6.b	655				How was the geochemical materials characterization program developed? Have methods and results been shared with all regulators? Is this characterization based on bulk sampling? How was sampling and methodology determined? Requested Action: Answer questions; modify text as warranted.
903	6.b	655				To what extent will the overburden stockpiled and stored on the surface contain sulfur? Requested Action: Answer question; modify text as warranted.
904	6.b	659				What are the impacts on surface and ground water surrounding the mining site of rainfall on the stockpiled overburden? Requested Action: Answer question; modify text as warranted.
905	6.b	659				Will the overburden be exposed to rain and snow? If so, what are the impacts on surface water and groundwater surrounding the mining site? Requested Action: Answer questions; modify text as warranted.
906	6.b	659				No liners are proposed for overburden storage; just unspecified BMPs to minimize dust. What is estimated chemical composition (such as mercury, sulfates, and other parameters) of the overburden/dust? Requested Action: Answer question; modify text as warranted.
907	6.b	659				What exactly will the Temporary Overburden Stockpile contain? Peat? Soil? Will the different overburden layers be kept separate? Requested Action: Answer question; modify text as warranted.
908	6.b	664				Classification of "waste rock" by sulfur content is insufficient to determine reactivity, because by law reactivity means adverse impacts on natural resources, not chemical acid/base reactions. Requested Action: Advisory only
909	6.b	664				EAW should disclose proposed cut-off levels for rock class based on sulfur and other parameters. Requested Action: Consider comment; modify text as warranted.
910	6.b	664				EAW should disclose the expected quantities each rock class. Requested Action: Consider comment; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
911	6.b	664				<p>Potential use of Class 1, Class 2 waste rock will depend on analysis of potential of various parameters at various levels to cause adverse impacts based on how they are managed. With this project, it is likely that all classes of waste rock will be reactive waste and all will require double liners, leachate collection and treatment, and possible covers.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
912	6.b	664				<p>The EAW speaks in generalities of high/low sulfur content rocks. Whether the rocks require different treatment based on their sulfur contents should be known (i.e., high sulfur content rocks are those with a sulfur content >x%).</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
913	6.b	666				<p>Please define or describe what the "material characterization program" would entail. If this the same thing as the "geochemical materials characterization program" described in line 655, then please use the same name.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
914	6.b	666				<p>In determining the classification of "development rock," does the characterization program consider the potential for the materials to leach chemicals that can adversely impact the environment?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
915	6	668				<p>What is the expected range of sulfur concentrations for Class 1, Class 2, and Class 3 development rock, respectively? If there are any sulfur content ranges known, include them in the updated EAW.</p> <p>Requested Action: Answer question; modify text as warranted.</p>
916	6.b	668				<p>Will any Class 1 or Class 2 development rock be stored on the surface in an area that is not lined?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
917	6.b	671				<p>The distinction between "ore" and "Class 3" waste rock is inconsistent with usage in applicable rules. Materials sent for processing are, by definition, various grades of ore.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
918	6.b	673				<p>What are the parameters of TBM mixed overburden and bedrock cuttings on which the Class 2 categorization has been made? If this is equivalent to Class 2 waste rock, what assumptions allow use of modular water quality treatment?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>
919	6.b	681				<p>The plan to "blend" highly elevated sulfur rock with lower-sulfur rock does not make the waste "qualify" for a lower classification. Would this proposed practice increase the risk that high sulfur seeding will exacerbate the leaching of a larger volume of toxic metals?</p> <p>Requested Action: Consider comment; modify text as warranted.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
920	6.b	681				<p>The concept of mixing high-sulfur and low-sulfur rocks to create a mixture which would qualify as Class 2 development is not in compliance with existing regulations. Diluting the high sulfur rock is not an acceptable approach for addressing the risks this material poses.</p> <p>Requested Action: Advisory</p>
921	6.b	681				<p>Please provide details on the process of blending higher-sulfur rock with lower-sulfur rock. Details including how and where the blending would occur, and would it occur within a lined area?</p> <p>Requested Action: Add text to address comment.</p>
922	6.b	682				<p>What gases will be released into the atmosphere as a result of the blending activity?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
923	6.b	682				<p>Would the blending operation and higher/lower-sulfur rock stockpiles be exposed to wind, rain, and snow before, during and after the blending process?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
924	6.b	682				<p>Clarify that mine contact water and seepage from waste rock will need to be treated to comply with all applicable numeric and narrative water quality standards including non-degradation.</p> <p>Requested Action: Modify text to address comment.</p>
925	6.b	687				<p>DNR notes the EIS treatment of using third-party commercial aggregate remains to be determined. DNR must determine whether the proposed use constitutes a connected action.</p> <p>Requested Action: Advisory only.</p>
926	6.b	687				<p>Explain the need to source aggregate at a rate of 300,000–450,000 tons per year. What is total excavation and total backfill per year?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
927	6.b	687				<p>The EAW suggestion for backfill of "fines," namely high sulfur, high metals, high ANFO materials without bringing them to the surface or management is questionable. This 2% of total backfill material is likely to be highly reactive, perhaps even more so than ore, and no evaluation, stabilization, or grouting is described.</p> <p>Requested Action: Add text to address comment.</p>
928	6	697				<p>What is the expected range of sulfur concentrations of the fines? Explain how an appropriate amount of alkaline material would be calculated and what it would consist of.</p> <p>Requested Action: Answer question; modify text as warranted.</p>
929	6.b	702				<p>DNR notes that EIS will require detailed evaluation of all materials proposed to be permanently placed in the underground mine works, whether as backfill or otherwise. Issues include methods to grout or seal mine works, faults, or fractures and effectiveness of measures to limit flow through fractures, etc. that could potentially affect aquifers.</p> <p>Requested Action: Advisory only.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
930	6.b	704				"Backfill materials" is improper terminology for waste rock. Waste rock would need to be stored in compliance with the reactive mine waste rule. Aggregate purchased for backfill is not waste rock and is appropriately managed differently. Requested Action: Modify text to address comment.
931	6.b	704				Schedule, volumes, and location of excavating and backfilling waste rock are unclear. No basis is provided to determine size and duration of waste rock stockpiles. Requested Action: Modify text to address comment.
932	6.b	704				Noise, vibration, and air quality impacts from the crushing facility must be evaluated in the EIS. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
933	6.b	721				Waste rock will be crushed to produce CRF. "Dust-control systems" is not an appropriate description of the need to control HAPs and particulates from this facility. Requested Action: Modify text with more appropriate characterization of the control technology necessary.
934	6.b	730				Classifications are "waste rock." Any rock sent for processing is ore. Requested Action: Modify text to address comment.
935	6.b	730				Graphic 11 appears to provide an incomplete listing of potential solid wastes. The EIS will require a full accounting of all potential solid waste generated by the project and their proposed management, including disposal. EAW Item 13b correctly cites Minnesota Statutes, section 116.06, subdivision 22 and Minnesota Rules, part 7035.0300, subpart 100, as applicable regulations. Requested Action: Confirm if Graphic 11 is incomplete.
936	6.b	730				Graphic 11 shows "Sump Fines" but the EAW has no discussion regarding sump fines. Requested Action: Add text to address comment.
937	6.b	730	11			Storing aggregate with Class 1 and Class 2 waste rock is diagrammed here. Waste rock must be managed as waste rock, not as "backfill materials." Requested Action: Consider comment; modify text as warranted.
938	6.b	730				Terminology seems misleading as well as inconsistent with Chapter 6132. Requested Action: Consider comment; modify text as warranted.
939	6.b	733				Describe what measures will be taken to cover and contain the haul trucks carrying ore and development rock between the portal and the ore storage and rail loadout facility. Requested Action: Add text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
940	6.b	734				How will Class 3 development rock be handled compared to how Class 2 development rock is handled? Requested Action: Answer question; modify text as warranted.
941	6.b	734				What is the level of the sulfur in that ore and development rock while in the haul trucks? Requested Action: Answer question; modify text as warranted.
942	6.b	734				What measures will be taken to eliminate dust and particulates from exiting the portals with the haul trucks and exiting the ore storage and rail loadout facility when the haul trucks enter and exit that facility? Requested Action: Answer question; modify text as warranted.
943	6.b	734				What measures will be taken to eliminate ore and development rock dust from being tracked on to the roadway and into the open atmosphere by the exterior and tires of the haul trucks as they journey the approximately 450 feet of surface roadway between the mouth of the portal and the entrance to the enclosed building through wind, rain, and snow? Requested Action: Answer question; modify text as warranted.
944	6.b	734				Will the material in the haul trucks be exposed at any time to the atmosphere, to wind, to rain, or to snow? Requested Action: Answer question; modify text as warranted.
945	6.b	734				What practices (water, chemicals, covers for trucks) would be used to minimize fugitive dust from hauling ore to rail loadout facility Requested Action: Answer question; modify text as warranted.
946	6.b	734				Is rail loadout inside a building? If not, what is a "facility"? If so, why remove from lines 337? Requested Action: Consider comment, modify for clarity
947	6.b	736				If known, would air scrubbers or fabric filters better control dust emissions? Requested Action: If known, answer question and update EAW accordingly.
948	6.b	741				What size rock would "run-of-mine" ore be? Is there a relationship on how the size of rock blasted relates to the number of blasts and amount of explosives required in the mining process? Requested Action: Answer question; modify text as warranted.
949	6.b	746				What is the basis for excluding areas of the site from the "contact water area," considering dust from overburden and waste rock stockpiles, particulates and dust from crushers, and traffic from vehicles entering the mine or moving waste rock? Requested Action: Modify text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
950	6.b	750				RGU notes that exploration of an alternative location of the rail spur (e.g., along road) may be part of the scoping decision. Requested Action: Advisory
951	6.b	756			1	Graphic 1 depicts a double rail line for the rail spur, but it is stated here that it would be primarily single track. Please clarify this discrepancy Requested Action: Consider comment; modify text as warranted.
952	6.b	764				If known, describe what known contaminants in the contact water are and how they would be treated. Requested Action: Consider comment; modify text as warranted.
953	6.b	772				This acknowledges groundwater inflow through rockfill during mining but does not address the issue of flow through to groundwater when the mine is no longer pumped. Requested Action: Consider comment; modify text as warranted.
954	6.b	777				Unless and until there is independent testing of sulfate and metals concentration demonstrating otherwise, all stormwater should be treated as contact water before release to the environment. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
955	6.b	777				Describe the difference between construction water and contact water, and what concentrations of sulfate and metals may be present. Requested Action: Consider comment; modify text as warranted.
956	6.b	778				Please define "industrial stormwater area" and "contact water area" and describe the difference between the two. Requested Action: Add text to address comment.
957	6.b	780				For classifying the various types of water, both industrial and construction stormwater should include the word "precipitation" as part of the description. It is probably worth noting that both "precipitation and stormwater" could result in either type of water depending on the circumstances. Requested Action: Consider comment; modify text as warranted.
958	6.b	782				Describe the location and quantity of this well water that is discharged after use. Requested Action: Add text to address comment.
959	6.b	788				Describe the quantity of this well water that will be evaporated into the atmosphere. Requested Action: Add text to address comment.
960	6.b	788				What quantities of water would be withdrawn from the well on an annual basis during each phase of the mine development, construction, operation, and closure? Requested Action: Add text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
961	6.b	788				Water treated by contact water treatment plant is described as "non-potable." Explain what treatment conditions, parameters make this water non-potable? Requested Action: Add text to address comment.
962	6.b	788				Revised EAW has removed language saying non-potable treated wastewater would be "discharged." If water is "used" underground, what happens to it after its use? Requested Action: Answer question; modify text as warranted.
963	6.b	794				This shows best management practices only for construction water, including contact with waste rock. No treatment, pond, or liner is described. Is it proposed to have direct discharge of construction/contact water, including mine excavation water directly to wetlands/watershed? Requested Action: Answer question; modify text as warranted.
964	6.b	808				Regarding the management of treated water discharged from the Contact Water Treatment Plant, the EIS will require identification of any additional treatment (e.g., sediment pond) or other BMPs prior to the proposed discharge to natural waters. Requested Action: Advisory only.
965	6.b	808				Regarding the management of non-contact stormwater, the EIS will require identification of any additional treatment (e.g., sediment pond) or other BMPs prior to the proposed discharge to natural waters. Requested Action: Advisory only.
966	6.b	811				What is the maximum possible area (in square feet) that will be utilized by vehicles that enter and exit the underground mine during each phase of development, construction, operation, and closure? Requested Action: Answer question; modify text as warranted.
967	6.b	821				Describe why all vehicles operating in the contact water area are not made entirely captive to that area. Requested Action: Add text to address comment.
968	6.b	826				The EIS will likely: assess any geochemical elements in the contact water runoff that is transferred in open air lined ditches; quantify the amount of water; and the amount and identity of gases that will be evaporated into the atmosphere each day when it is carried in the open-air lined ditches. If known at this time, describe how this open ditch will function during freezing weather. Requested Action: Advisory. Answer question.
969	6.b	832				Describe the geochemical elements in the water that is routed to the lined footprint of the backfill materials storage area, and quantify the amount of water and amount and identity of gases that will be evaporated into the atmosphere each day when it is carried to the lined footprint of the backfill materials storage area. Describe how this lined footprint of the backfill materials storage area will function during freezing weather. Requested Action: Add text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
970	6.b	832				Describe why open ditching is proposed here for contact water runoff as opposed to the piping described in 960–965? Requested Action: Add text to address comment.
971	6.b	832				What is the anticipated storage need for contact water and proposed sizing of tanks? How will treatment plant size be determined? What are the assumptions for precipitation, inflow, pumping, seepage during normal operations and extreme precipitation events? Requested Action: Answer questions; modify text as warranted.
972	6.b	832				Why are the sumps no longer described as "lined"? The contact water must be isolated from the environment, not allowed to slowly seep into the near-surface groundwater. Requested Action: Answer question; modify text as warranted.
973	6.b	832				The contingency proposal for containment in the area around the tanks or in the waste rock storage area does not consider that these areas would also be saturated in the event of a storm event. Requested Action: Add text to address comment.
974	6.b	854				Describe the geochemical elements of, and the volume of, the groundwater displaced by the pressure-grouting injected into enhanced permeability zones encountered during mine workings. Requested Action: Add text to address comment.
975	6.b	845				RGU notes that the Contact Water Treatment Plant plan will need to be determined for evaluation in the EIS. Requested Action: Advisory
976	6.b	853				Describe the impact this displacement of groundwater will have on the region's geology and hydrology and its impacts on surface water and ground subsidence. Requested Action: Add text to address comment.
977	6.b	853				Disclose all areas of enhanced permeability expected based on existing known information. Map and describe the size and anticipated inflow. Requested Action: Add text to address comment.
978	6.b	854				Information is needed on faults and fractures likely increasing with blasting. Additionally, what is meant by a "predetermined rate of inflow and duration" that might trigger grouting. What are examples of grouting efficacy, duration, and application under similar conditions? Requested Action: Answer questions; modify text as warranted.
979	6.b	862				What is the long-term effectiveness of grout in a sulfide-ore mine? Note that definition of grout in the rules does not pertain to sealing a mine excavation or suggest it would be effective. Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
980	6.b	872				<p>It is possible that an Individual NPDES permit would be needed for all stormwater release due to effects of sulfate seepage to adjacent wetlands, mercury release, and methylation.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
981	6.b	878				<p>Assumption that "construction water" including groundwater from mine excavation and TBM will not be considered mine "contact water" requiring treatment other than BMP's is not supported. Non-standard use of terminology throughout draft EAW undermines protective pollution controls. This is water from excavating waste rock.</p> <p>Requested Action: Modify the text so that consistent terminology is used throughout the EAW.</p>
982	6.b	884				<p>The EAW assumes "stormwater treatment systems" BMPs are sufficient prior to discharge to the "watershed near the northern boundary of the Project". A discussion is missing on sulfate, mercury, and proximate wetlands. The northern boundary is coniferous bog wetlands and deep marsh (graphic 19).</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
983	6.b	884	19			<p>The revised EAW deletes text describing discharge to "nearby wetlands and/or ditches" in favor of discharge to "the watershed near the northern boundary of the Project Area. Is this discharge point wetlands and does it contain ditches?"</p> <p>Requested Action: Answer question and add text as warranted.</p>
984	6.b	884				<p>The description of "non-contact" stormwater areas here does not consider dust, spills, particulates, or fugitive emissions and is likely to be overbroad. Constituents need to be tested and verified before any release without treatment.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
985	6.b	885				<p>Clarify what is meant by "the watershed near the northern boundary".</p> <p>Requested Action: Edit text as requested.</p>
986	6.b	897				<p>Describe why BMPs should not require all discharges of all contact water to meet potable standards.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
987	6.b	903				<p>What is total volume of water proposed to be appropriated from groundwater, whether by a well or by mining? Once the mine is underway, is it proposed that the appropriation will be from groundwater inflow to the mine?</p> <p>Requested Action: Answer question; modify text as warranted.</p>
988	6.b	906				<p>RGU notes potential for impacts from construction as well as discharges to "the watershed near the northern boundary" is likely an issue identified in the v1SEAW for treatment in the EIS.</p> <p>Requested Action: Advisory only.</p>
989	6.b	908				<p>Expected volume is an important component with comparison to current flow regime of the Tamarack River and the connecting tributary.</p> <p>Requested Action: Consider comment; modify text as warranted</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
990	6	913				Please provide an estimate in cubic feet per second or gallons per minute. Requested Action: Modify text to address comment.
991	6.b	913				What quantities of water would be withdrawn from this additional water supply well on an annual basis during each phase of the mine development, construction, operation, and closure? Requested Action: Answer question; modify text as warranted.
992	6.b	919				It is proposed to source potable water from a well or treat it at a "potable water treatment plant." This seems to confirm that the contact water treatment plant is intended to release non-potable water Requested Action: Consider comment; modify text as warranted.
993	6.b	923				Describe the sources, nature, and annual volume of the sanitary wastewater during mine development, construction, operation, and closure phases. Requested Action: Add text to address comment.
994	6.b	924				Treatment method and compliance standards for treated sanitary water is not specified. Requested Action: Add text to address comment.
995	6.b	942				Reasonable to expect detailed additional input in scoping on what constitutes an appropriate electrical generation emissions profile (e.g., is eGRID is too crude? FSD or other guidance may involve consideration of more localized power sources to be factored into the GHG analysis, with an evaluation of possible increased reliance on renewable power sources. Requested Action: Advisory only.
996	6.b	942				Has the proposed new substation and transmission line been approved by the Public Utilities Commission? When would it be constructed? Would ratepayers or the mine owners pay these costs? Requested Action: Answer questions; modify text as warranted.
997	6.b	943				Quantify the power draw of the TBM. Requested Action: Add text to address comment.
998	6.b	947				Are propane and diesel storage tanks all above ground? How would fuel be transported to meet underground needs? Requested Action: Answer questions; modify text as warranted.
999	6.b	951				What is the supply source of the air used as compressed air? Will it be compressed on site from ambient air? Requested Action: Answer questions; modify text as warranted.
1000	6.b	956				Please provide details on the power requirements, safety, and risks associated with the compressed air building. Requested Action: Add text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1001	6.b	956				Describe how the various kinds of piping (buried, surface, bridged) described here will be secured against leakage due to freezing and thawing, earth subsidence, and malfunction. Requested Action: Add text to address comment.
1002	6.b	960				For both the aboveground and underground pipelines for contaminated water, discuss methods to prevent and detect leaks and the effects of blasting on pipeline breaches. Requested Action: Add text to address comment.
1003	6.b	960				Impacts of buried pipelines on near-surface hydrology will need to be assessed. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1004	6.b	992				Need to map/illustrate where and when depleted ore extraction drifts would be backfilled. Requested Action: Add a figure as requested.
1005	6.b	993				EAW states "if there is no beneficial reuse" surface and underground infrastructure will be removed. However, prior text states that tunnel loop will be permanent (see lines 420–422). Requested Action: Consider comment; modify text as warranted.
1006	6.b	999				Describe what would be mitigated by intentionally increasing the rate of mine flooding. Requested Action: Add text to address comment.
1007	6	998				Mine flooding will cause AMD. Look forward to additional details regarding what areas will be backfilled and what areas will not be vs. which areas will be flooded or not. Requested Action: Consider comment; modify text as warranted.
1008	6.b	998				Describe why BMPs would not require complete backfilling of the mine access declines and mine development areas excavated outside the orebody. Requested Action: Consider comment; modify text as warranted.
1009	6.b	998				Possible mitigation of mine flooding rate and interaction between deep and shallow bedrock will be considered in EIS for when "mining is complete." Please describe the effects of mine flooding and interaction between aquifers, and explain what is meant by "mining is complete." Requested Action: Add text to address comment.
1010	6.b	998				As currently understood, why would mine development areas excavated outside the orebody not be backfilled? Requested Action: Answer question.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1011	6.b	1002				Leaving mine access declines unfilled would lend themselves to move more surface water downwards, which could affect wetlands. Requested Action: Advisory.
1012	6.b	1002				Describe the key factors that would shape the determination of the appropriate time for the bulkhead sealing of the mine portals, and who would determine that? Requested Action: Answer question; modify text to address comment.
1013	6.d	1031				Change "Talon Metals" to either "Talon Nickel's" or "the Project's" Requested Action: Edit text as requested.
1014	6.b	1036				Family-sustaining jobs would likely need longer employment than 7-10 years. Requested Action: Consider revision.
1015	6.b	1051				There is very limited information on iron throughout the document. If known, please describe more about the iron in the deposit. Requested Action: Add text to address comment.
1016	6.d	1054				How does the supply timeline of the existing agreement compare with the production timeline of the Tamarack Mine? Requested Action: Answer question; modify text as warranted.
1017	6.d	1054				If there is publicly available information, what is the term of the commitment to supply nickel for Tesla? Requested Action: Answer question; modify text as warranted.
1018	6.d	1055				The cited article states, "The top three suppliers last year were Canada (42%), Norway (10%) and Finland (9%)". The cited article pertains to refined nickel, not whether nickel is sourced from recycling or mining. Requested Action: Consider comment; add clarity to text.
1019	6.e	1117				The historical annual temperature increase in the watershed is shown, but there is no discussion of its impact on the project. Requested Action: Consider comment; modify text as warranted.
1020	7.a	1129				DNR notes issues for the EIS may include assessing how changes to the historical precipitation and temperature trends could potentially make the watershed and wetlands more vulnerable to impacts from water appropriation, mine drawdown, and localized discharge. Factors could include potentially increased periods of drought for example. Any potential cumulative effects for reasonably foreseeable future projects could also be a consideration. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1021	7.a	1137				The graph indicates an increase in "100-year" storm events in NE Minnesota. Which of these events have been more than "100-year" storm events? More information is needed to evaluate the likely scope of flooding as well as storage in extreme events. Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1022	7.a	1139				What impact will the projected total Project emissions have on short-term and long-term climate change? Requested Action: Answer question; modify text as warranted.
1023	7.a	1139				What is the projected total Project emission quantity of CO2 during each mine development, construction, operation, and closure phase over the entire life of the Project? Requested Action: Answer question; modify text as warranted.
1024	7.a	1139				Greenhouse gas predictions. Are these predictions for the earth as a whole? Requested Action: Answer question; modify text as warranted.
1025	7.a	1139				Future climate projections and additional information about past climate can be found at www.heat.gov and www.heat.gov/pages/climate-explorer Requested Action: Consider comment; edit text as warranted.
1026	7.a	1162				The predicted changes in the Mississippi River watershed temperature likely increase under most models. How does temperature change increase the vulnerability of plants, fish, and wildlife? Requested Action: Answer question; modify text as warranted.
1027	7.a	1172				Models vary in the predicted changes of precipitation trends. Average rainfall may not be the most significant factor for Project impacts. Seasonal data and trends in seasonal variation is more likely to affect water management and wetland impacts. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1028	7.a	1172				To evaluate impacts on wetlands, ecosystems, also need to know evapotranspiration not just precipitation. Requested Action: Consider point and add text if warranted.
1029	7.a	1176				Need to address how EPA predicted increase in 100-year storm intensity affects project. Do predictions cover even more extreme weather events? Requested Action: Add text to address comment.
1030	7.a	1177				Need more information on streamflow predictions based on seasonal or variable increases, not just annual averages. Requested Action: Add text to address comment.
1031	7.a	1180				DNR notes it is premature to conclude whether any long-term consequences of climate change will have consequences in the context of the proposed project. v2 Lines 1183- 1184 correctly acknowledge the need for more detailed analysis to reach any determination. Expect this to be identified in the Draft Scoping Decision Document. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1032	7.a	1183				EAW states "more detailed analysis of the climate change impacts during the project life will be addressed in the EIS". Available climate models from the University of Minnesota do not cover the project period. What mode(s) will be used in the EIS to do a climate impact analysis? Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1033	7.a	1188				What consequences will the net loss of vegetation and other buffer strips that will be caused by the Project development have on the harvesting of wild rice, the native fish population, and ducks and other wildlife? Requested Action: Answer question; modify text as warranted.
1034	7.b	1188				DNR notes that issues to be addressed in the EIS could include any net loss of vegetation and other buffer strips due to project-related development, and how this may affect runoff generated during intense rain events (especially if they are more frequent). Requested Action: Advisory only.
1035	7.b	1192				EAW acknowledges "loss of wetlands and associated flood storage" and "decrease carbon sequestration." Listed adaptations of design to "handle extreme rain events" and planting vegetation "where feasible" do not address these losses. Requested Action: Consider comment; modify text as warranted.
1036	7.b	1192	5			Table 5 project info: Rail line thru wetland may alter capacity and route of water thru that wetland. Requested Action: Consider comment; modify text as warranted.
1037	7.b	1192				RGU notes assessment of GHG contributions could include consideration of non-Minnesota project components. This will be specified in the Draft Scoping Decision. Requested Action: Advisory only.
1038	7.b	1194				Footnote minimizes climate considerations due to "short duration" and "small footprint." Requested Action: Consider comment; modify text as warranted.
1039	7.b	1195				The environmental review should address the ways in which it may make fish, wildlife, plant communities, and sensitive ecological resources more vulnerable to the climate stresses they are experiencing (and are expected to experience). Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1040	8	1203				RGU notes a potential issue to be addressed could be the cumulative impact that the net loss of wetlands during operations and closure have on climate change. Requested Action: Advisory only.
1041	8	1207	7			Is there a reason why no green infrastructure proposed? Requested Action: Answer question; modify text as warranted.
1042	8	1208	8			For the 24.4 percent of tree canopy removed, where and how many trees will that be, and what would be the effect on wooded wetlands? Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1043	8	1218	9			Consultation with regional THPOs occurs as part of NHPA Section 106 concurrence, but direct communications with the regional THPOs are strongly encouraged. Requested Action: Advisory only.
1044	9	1218	9			Lists EPA "Underground Injection Control Permit." What aspect of the project does this pertain to? Requested Action: Answer question; modify text as warranted.
1045	9	1218	9			Change "(MDOT)" to "(MnDOT)". "MDOT" is "Michigan Department of Transportation". Requested Action: Modify text to address comment.
1046	9	1218	9			RGU notes that MPCA stormwater permits listed in Table 9 will be reviewed by agency staff against the Proposed Project components, potential sources of stormwater, and applicable regulatory requirements. Requested Action: Advisory only.
1047	9	1218	9			Does not identify any permitting needed for pipelines for water on site. How is it anticipated they would be regulated? Requested Action: Answer question; modify text as warranted.
1048	9	1218	9			Does not identify permits for the substation and transmission line branch as needed for operations. Requested Action: Add text to address comment.
1049	9	1218	9			What hazardous waste generation will need permit? Full scope of chemicals not disclosed. Requested Action: Answer question; modify text as warranted.
1050	9	1218	9			What licenses, leases, and easements are needed to cross public lands and waters? Not discussed in text. Requested Action: Answer question; modify text as warranted.
1051	9	1225	9			For consistency with the rest of the EAW, change "Section 21" to "Question 21". Requested Action: Modify text to address comment.
1052	10.a.i	1228				Should mention that the project is in close proximity to the 1854 Ceded Territory (needs consideration when looking at potential impacts from project), especially since one of the explored ore deposits is within the 1854 Ceded Territory, even though it is not currently proposed. Requested Action: Consider comment; modify text as warranted.
1053	10	1230				Land use description should provide greater context of the surrounding area within the watersheds. A description of other important land areas, such as WMAs and State Parks, downstream of project area would be appropriate to frame where indirect impacts may occur or need to be monitored. Requested Action: Consider comment; modify text as warranted.
1054	10.a.i	1230				Proposed railroad alignment crosses two types of DNR Forestry administered state lands: Consolidated Conservation (Con-Con) and School Trust lands Requested Action: Modify text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1055	10.a.i	1237				Water in ditches flow to the Tamarack and then Prairie Rivers, which is a major tributary to Big Sandy Lake Reservoir that outlets into the Sandy River and then to the Mississippi River. Big Sandy is the most used surface waterbody completely within Aitkin County, and significant commercial, recreational, and residential development. Requested Action: Consider comment; modify text as warranted.
1056	10.a.i	1241				Please identify any cemeteries located in the area impacted by the Project, including on Big Sandy Lake and other areas within the watershed affected by the Project. Requested Action: Consider comment; modify text as warranted.
1057	10.a.i	1262				EAW states that mining may occur in the project area zoned for Open and Farm Residential. Have the project proponents concluded that no amendment of zoning would be needed for the mine? Requested Action: Answer question; modify text as warranted.
1058	10	1277				Explain risk criteria for flooding with the water table within one foot of the surface at most of the site. Requested Action: Consider comment; modify text as warranted.
1059	10.a.iv	1281				The EAW states "the Project would be compatible with current zoning and the Aitkin County Plan." Is it correct that the proposer is not seeking changes in the Aitkin County Plan? Requested Action: Answer question; modify text as warranted.
1060	10.b	1296				The EAW describes glaciolacustrine sediments approximately 100–130 feet thick. It does not describe how this surficial geology relates to project as required in Question 11.a. Information is needed on hydrogeology, vertical and horizontal connections to wetlands complex and underlying bedrock. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1061	11.b	1147				DNR notes the DSDD will likely require assessment on the potential for altered hydrology to influence water levels. Lower water levels could lead to impacts on peat and muck soils such as decomposition leading to higher GHG emissions and altered habitat conditions. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1062	11.a	1296				Surficial geology description does not provide enough detail. Please include sources for information. May want to consider adding cross section of quaternary aged sediment. Requested Action: Consider comment; modify text as warranted.
1063	11.a	1296				May want to consider organizing description of sediments by age (i.e. Holocene sediments (Peat), Late-WI), acknowledging a complex or suite of sediments within an age is ok. Requested Action: Consider comment; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1064	11.a	1296				May want to further analyze or specify area of surficial disturbance and types of sediment that will be encountered. Requested Action: Consider comment; add text as warranted.
1065	11.a	1312				Please include more detail about the bedrock characterization and associated mineralization at depth, include cross sectional information (what units are encountered at what depth), as well as any structural features that are encountered. Requested Action: Add text as requested.
1066	11.a	1312				Please include more detail about bedrock competency by rock type. Requested Action: Add text as requested.
1067	11.a	1312				Please include cross-sectional information to better characterize overburden thickness and bedrock units. Requested Action: Add text as requested.
1068	11.a	1317				EAW notes that rocks were deposited in a "deep-water basin." Provide information on salinity, potential artesian locations. Requested Action: Consider comment; modify text as warranted.
1069	11.a	1321				The EAW describes Thomson Formation and its relationship to the Tamarack Intrusive Complex (TIC), stating "[f]ormation strata are folded nearly upright", but does not describe how these features affect project hydrogeology. Requested Action: Consider comment; modify text as warranted.
1070	11.a	1325				The EAW describes the extent of the Tamarack Intrusive Complex (TIC) mineralization. The EIS should analyze the cumulative impacts of mining the TIC. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1071	11.b	1350				Regarding the significance of nearly flat topography in area of wetlands and shallow lakes within former lake plain of Glacial Lake Aitkin: Are these the conditions that contribute to flooding and changes in direction of surface water flow? Requested Action: Answer question; modify text as warranted.
1072	11	1358				Does this mean that 48 percent of the soils are peat, muck, and standing water? This statement is inconsistent with table 10 and appears to be a way to suggest that there is more non-hydric soils present at the site than there really is. Requested Action: Answer question; modify text as warranted.
1073	11	1360	10			This table suggests that more than 67% of the site has hydric soils. Text and tables should be consistent. Requested Action: Consider comment; modify text for consistency.
1074	11.b	1360				Are these percentages of the area where surface facilities would be developed or also the soils above the 225 acres of underground mine facilities. Acreage and mapping of this is requested. Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1075	11.b	1367				Proposes surface facilities construction in areas with sandy soils for "both engineering and drainage purposes." For what facilities is "drainage" desirable? Which features would be located on "peat or muck" soils? Requested Action: Answer questions; modify text as warranted.
1076	11.b	1373				Site clearing and grubbing 79 acres, fill of 553,000 cubic yards. What areas would be cut and filled? Requested Action: Answer question; modify text as warranted.
1077	12	1376				The scope of the water quality and water level monitoring is unclear from the document. An overview of this monitoring area should be provided. Requested Action: Consider comment; modify text as warranted.
1078	12.a.i	1384				Given that the Project drains towards Big Sandy Lake and Sandy River, and that the Project is generally located within the USGS Water Resource Region 7, what impact will the project have on the wetlands between the Project Area and Big Sandy Lake/Sandy River? Requested Action: Answer question; modify text as warranted.
1079	12.a.i	1384				For consistency with the rest of the paragraph, list "Upper Mississippi River Basin" as "Mississippi River – Grand Rapids (HUC08 #07010103) Basin" Requested Action: Modify text to address comment.
1080	12.a.i	1389				EAW does not discuss role of wetlands in surface hydrology or direction of flow in flood conditions. Should map all wetlands, ditches, waters, direction of flow during normal and flood conditions. Requested Action: Consider comment; modify text as warranted.
1081	12.a.i	1390				Change "The watersheds generally drain from east to west..." to "The watersheds generally drain from east to west and south to north...". Requested Action: Consider comment; modify text as warranted.
1082	12.a.i	1399				Identify the cumulative impacts of the Project on reserved treaty rights with various Indian tribes, both within the Project Area and in the watershed including all Region 7 areas. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1083	12.a.i	1399				Identify the public waters basins located within two miles, three miles, four miles, five miles, ten miles, and twenty miles of the Project Area with information similar to that provided for public water bodies within one mile. Requested Action: Consider comment; modify text as warranted.
1084	12.a.i	1402				Loon Lake (01-0115) is in Savanna Portage State Park and is a trout lake in Big Sandy Headwaters watershed, 0701010305. Requested Action: Consider comment; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1085	12.a.i	1403				Rice is present in streams, rivers, and lakes that are not listed in the EAW. Requested Action: Add text to address comment.
1086	12.a.i	1414				Incomplete listing of lakes; omits Lake Minnewawa. Even with respect to "public waters basins" is not complete. Requested Action: Add all waterbodies to table.
1087	12.a.i	1414		12		Mud Lake, Tamarack Lake, and Big Sandy Lake are not the only waterbodies listed as a wild rice water. All wild rice waters should be identified based on most current MPCA data base. DNR listing not define wild rice waters. Requested Action: Add all waterbodies to table.
1088	12.a.i	1429		12		One mile distance isn't relevant to the presence of impaired waterbodies. The question asks whether there are impaired waters at any point downstream that would potentially be impacted by the Project. This is an incomplete list. Requested Action: Add all waterbodies to table.
1089	12.a.i	1434				DNR notes the TMDL will likely be an important source of information. Analysis likely to include: wetlands due to ditching, municipality and ag wastewater, and increased runoff and septic from developed properties as ditching is affecting both the channel erosion and release of nutrients from wetlands. It will be necessary to understand any potential interaction with the project and its impacts. Requested Action: Advisory only. Likely an issue identified in v1SEAW for analysis in the EIS. TMDL likely to be identified as an available information source in v1SEAW.
1090	12.a.i	1438				Figure 12 should both map all waters. An additional layer could show which are designated as public waters for DNR permitting of work in public waters. Requested Action: Consider comment. Add to Figure as warranted
1091	12.a.i	1454				The EAW notes that a portion of Minnewawa Creek upstream of public waters classification is listed as impaired due to bioassessments. DNR does not control listing under Clean Water Act. The EAW should identify all impaired waters, irrespective of DNR classification. Requested Action: Consider comment; modify text as warranted.
1092	12.a.i	1458				DNR public waters in this Table should be mapped along with the segment of Tamarack River identified as impaired. HUC numbers should be provided for segments and unnamed streams for verification. All impaired streams and river segments should be identified and mapped. All IBI impairments should be identified and listed. The AUID for the E. coli impaired segment of the Tamarack River is 07010103-758. Requested Action: Add text to address comment.
1093	12.a.i	1469				Project proposer claims that flood plains delineated 40 years ago "cannot be used for regulatory purposes." Is regulatory purpose referred to anything other than provision of flood insurance? Non-digitized delineation would not affect whether must be considered in environmental review under MEPA and NEPA. Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1094	12.a.i	1474				Identify at this stage, updated periodically on a monthly basis, the specific locations where surface water flow and surface water quality are being monitored, and describe the rationale for locating those monitoring sites where they are located. Requested Action: Consider comment; modify text as warranted.
1095	12.a.i	1474				For how long has Talon been monitoring surface water flow and water quality? Information should be provided to all regulators prior to completing draft EAW and to inform scoping of EIS. Requested Action: Answer question; modify text as warranted.
1096	12.a.i	1480				Please identify which specific agencies the wetlands delineation report was submitted to in July 2023 and are pending technical review. Please also provide the full report in the revised EAW. Requested Action: Modify text to address comment.
1097	12.a.i	1493				Identify the specific location of the outer boundaries of the area subject to monitoring (within and near the Project Area). Requested Action: Modify text to address comment.
1098	12.a.i	1493				How long and for what parameters has Talon been monitoring wetland water levels and water quality? Which agencies, if any, participated in determining what should be monitored and what conceptual model should be applied? Data and conceptual models should be provided to agencies prior to proceeding with EIS scoping. Requested Action: Answer questions; modify text as warranted.
1099	12.a.ii	1503				Additional information known to DNR includes some artesian flow springs in the Horseshoe Lake (01-0034) area - between Horseshoe and Round Lakes (01-0023). This is likely why such a shallow and dark lake like Horseshoe remains cooler than typical in summer months. Also, as the crow flies its about 16 miles to Two River Springs Creek (M-122), where upwelling springs maintain coolwater for trout management. This is also likely the case at Loon Lake in Savanna Portage SP, where trout are also managed for angling. This information should be considered in the relevant impact analyses. Requested Action: Information only. Ensure information provided to appropriate parts of proposer team.
1100	12.a.i	1505				Are any areas within 20 miles of the Project Area within a MDH wellhead protection area? If so, please identify each such area. Requested Action: Answer questions; modify text as warranted.
1101	12.a.ii	1505				The claim that the Project is not within a wellhead protection area only means it is not a public water source area. The EAW should identify and classify both public water system wells and private data wells near the Project area along with data on depth and any water quality data. Requested Action: Consider comment; modify text as warranted.
1102	12.a.ii	1511				EAW should disclose what tests, if any, have been done to evaluate hydrological connections between wells and other groundwater. EAW should disclose any information on water quality sampling of supply wells. Requested Action: Consider comment; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1103	12.a.ii	1511				One mile distance is not enough for a proper evaluation of baseline impacts. See the PolyMet FEIS Requested Action: Consider comment; modify text as warranted.
1104	12.a.ii	1523				Need further information on size and location of Quaternary buried artesian aquifer where the majority of water supply wells are located and undifferentiated aquifer where at least one other well is located. Requested Action: Consider comment; modify text as warranted.
1105	12.a.ii	1529		15		For how long has Talon been monitoring groundwater levels and water quality? For what parameters? Which agencies, if any, participated in determining what should be monitored? Data and methods should be provided to all agencies prior to proceeding with EIS scoping. Requested Action: Answer the question; future discussion item for the Draft Scoping Decision Document
1106	12.a.ii	1533				When the EAW refers to "uplands" what depth to water is the minimum to designate an "upland"? For this characterization, are the surface lands above mine workings considered part of the project area? Requested Action: Answer questions; modify text as warranted.
1107	12.b.i.3	1567				Why does revised EAW cite 2020 data on mine inflow if there is hydrogeological information since 2020, including exploration results showing areas of inflow? Current data should be provided before scoping. What faults and fractures do 2020 and current estimates of inflow reflect and at what locations (horizontal and vertical)? Requested Action: Answer questions; modify text as warranted.
1108	12.b.i.3	1579				EAW assumes that 26 acres of proposed site would be "contact water area." The need to collect and treat water on the surface of the site is likely greater than assumed. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1109	12.b.i.3	1583				Inflow and "contact water" numbers are likely to need revision. What parameters would the water treatment plant treat to remove from mine inflow and other contact water? Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1110	12.b.i.3	1587				If known please provide responses to the following: 1) What is the total capacity of sanitary water treatment plant storage tanks? 2) What is the total capacity of contact water treatment plant storage tanks? 3) It is proposed that treated water from both of these plants would be discharged to the same location; is it proposed that discharge would be continuous, and if not, how would it be scheduled? Requested Action: Answer questions if known.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1111	12.b.i.3	1591				<p>The discussion focuses on the ability to accommodate additional flow without channel forming. However, there may be significant impacts to water ecology (due to changes in water chemistry or clarity) with discharges that do not pose a channel-forming risk.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1112	12.b.i.3	1597				<p>EAW suggests that downstream waters can adapt to flow 20% above channel forming flow. How does this assumption consider each of the following: effects on downstream wild rice, degradation of water quality where there are no numeric limits or where current water quality exceeds numeric limits, and internal loading affected impaired waters?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>
1113	12.b.i	1599				<p>DNR notes the evaluation of the ditch to handle discharge of treated water will be an issue requiring detailed analysis in the EIS. Sampling locations, along with the date/time of data collection, will be identified to ensure appropriate interpretation (e.g., LV-006).</p> <p>Requested Action: Advisory only. Future discussion item for data requirements for SEAW, including figures.</p>
1114	12.b.i.3	1599				<p>Channel-forming flow pertains to the water volume that will carve out a new stream corridor. It does not reflect ecosystem effects. Location of LV-006 at the site may not representative of downstream channel conditions.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1115	12.b.i.3	1609				<p>Aquatic biota could be affected by other factors other than direct discharge, including dewatering, seepage, and air emissions.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1116	12	1611				<p>DNR notes that likely for DSDD to identify potential risks of groundwater contamination in project closure, interacting with climate change, as an issue requiring consideration.</p> <p>Requested Action: Advisory only.</p>
1117	12.b.i.3	1612				<p>What modeling/data/references support the following statement in the EAW: "Current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount are not expected to significantly influence the environmental effects from stormwater discharges on receiving waters"?</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1118	12.b.i.3	1612				<p>DNR notes it is premature to conclude whether any long-term consequences of climate change will have consequences in the context of the proposed project. v2 Lines 1620-1622 correctly acknowledge the need for more detailed analysis to reach any determination. Expect this to be identified in the Draft Scoping Decision Document. Issue areas include potential for increased precipitation events and/or periodic drought could interact with impacts of mine dewatering, seepage, discharge of chemicals with higher concentrations than current waters. Potentially affected resources include: biota; wild rice; wetlands. Climate resiliency could also be a consideration.</p> <p>Requested Action: Advisory only. Issue to be considered for DSDD.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1119	12.b.i.3	1643				EAW proposes "construction stormwater general permit" with SWPPP BMPs to address sedimentation, no other treatment before release to wetlands and streams. Note that "construction water" is previously defined to include mine construction water as well as surface construction. Mine construction water is contact water and must be managed accordingly, Requested Action: Consider comment; modify text as warranted.
1120	12.b.ii	1658				Industrial stormwater effects are presumed minor although the only treatment proposed is to remove suspended solids. This does not address chemical constituents (sulfate, metals) in water or in retained sediments. Requested Action: Consider comment; modify text as warranted.
1121	12.b.ii	1661				Do plans for water management include allowing the mine to flood as a result of inflow in a heavy rain event if capacity for storage of inflow in tanks is exceeded and stockpile area saturated? Requested Action: Answer question; modify text as warranted.
1122	12.b.ii	1663				The EAW states the current plan is to accommodate up to a 200-year 24-hour event. Graphic 15 shows seven 100-year storm events in past two decades. There is no data in the EAW on the frequency of 200-year storm events or a definition of what this means in terms of volume and duration of precipitation. There is no basis to judge sufficiency of proposed water management system capacity Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1123	12.b.ii	1666	15			If known, what are concentrations of sulfate, mercury, and other salts and metals proposed to be discharged to the "immediate receiving waters for stormwater discharged," the "nearby unnamed wetlands and/or ditches?" Requested Action: Answer question; modify text as warranted.
1124	12.b.ii	1673				How would change in land cover, runoff, discharges affect nearby wetlands, particularly in periods of high water? Requested Action: Answer question; modify text as warranted.
1125	12.b.ii	1678				How does adding more wastewater from mine dewatering mitigate rather than exacerbate the effects of increased runoff from project area impervious surfaces? Both add surface water at greater volumes and with greater concentrations of salts and metals than existing conditions. Requested Action: Answer question; modify text as warranted.
1126	12.b.ii	1684				Does not discuss the risks from climate change rainfall intensity. Risks include not only greater flooding, but introduction of harmful chemical parameters. Requested Action: Add text to address comment.
1127	12.b.ii	1686				For consistency with the rest of the EAW, change "as noted in item 12.b.i.3" to "as noted for Question 12.b.i.3". Requested Action: Modify text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1128	12.b.ii	1692				EAW claims no receiving waters have "construction-related water impairments." However, Lake Minnewawa, Horseshoe Lake, Minnewawa Creek, Sandy River, and Big Sandy Lake, including the shallow embayment where the Prairie River enters Big Sandy Lake, are shown as impaired using MPCA's cited tool. Need to analyze hydrologic and chemical changes (e.g. addition of sulfate) to evaluate whether mine and facilities construction would cause or contribute to these impairments. Requested Action: Consider comment; modify text as warranted. To be discussed in development of Draft Scoping Decision Document
1129	12.b.ii	1709				How much water is proposed to be appropriated from groundwater, at what locations, and at what times? Requested Action: Answer question; modify text as warranted.
1130	12.b.iii	1712				No explanation of what is meant by temporarily removing groundwater for construction of the decline, use of TBM. Is this the "construction water" that would be released to wetlands and ditches? Requested Action: Answer question; modify text as warranted.
1131	12.b.iii	1717				RGU notes that DNR water appropriation permits listed in Table 9 will be reviewed by agency staff against the Proposed Project components, activities requiring appropriation, and applicable regulatory requirements. Requested Action: Advisory only.
1132	12.b.iii	1724				Please provide a graphic representation of the tunnel loop superimposed on wetland delineation. Requested Action: Consider comment, add graphic.
1133	12.b.iii	1724			19	Based on prior Graphics 1 and 2, overburden stockpile is proposed on a hardwood swamp. The tunnel loop appears to be proposed in wetlands, primarily open bog. It is not clear what facilities will be built over purple area in center of site. Colors should be less similar to more effectively distinguish wetlands types. Requested Action: Modify graphic to address comment.
1134	12.b.iii	1728				EAW states well for site drinking water would need appropriation for 4.8 million additional gallons per year. Where would potable water well be located? And at what depth? Requested Action: Answer questions; modify text as warranted.
1135	12.b.iii	1736				EAW says either treated contact water or new well water would be used to supply the TBM and during early stages of operations. Explain why (untreated) mine construction water would not be used? What would be the constituents? Requested Action: Answer questions; modify text as warranted.
1136	12.b.iii	1746				Identify and map all known locations of significant inflow based on exploratory drilling, geology, and hydrogeology, showing depth from the 400 to 1,900 feet below the surface where EAW text notes inflows are predicted. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1137	12.b.iii	1749				For consistency with the rest of the EAW, reference "Question 12(b)(i)(3)" as "Question 12.b.i.3". Requested Action: Modify text to address comment.
1138	12.b.iii	1752				For consistency with the rest of the EAW, reference "Question 12(b)(i)(3)" as "Question 12.b.i.3". Requested Action: Modify text to address comment.
1139	12	1753				Reminder to make sure that assessment methods and duration are clearly articulated regarding indirect and direct impacts to all water resources in and around the project area Requested Action: Advisory.
1140	12.b.iii	1753				An assessment of withdrawal of groundwater inflow on wetlands and streams would require disclosure of faults and fractures and testing, including pump tests of various durations, to determine connections between aquifers and wetlands. How much of this testing has been done and over what time duration? Detail nature and results of tests. Requested Action: Answer question; modify text as warranted.
1141	12.b.iii	1753				Whether or not drought would require surface water appropriation, EAW must analyze whether appropriations from shallow or deep aquifers would exacerbate drought. Requested Action: Consider comment; modify text as warranted. To be discussed in development of Draft Scoping Decision Document
1142	12.b.iv	1778				If the average subsidence modeled is 0.2in, what is the range across the area? Requested Action: Answer question, add text to address comment.
1143	12.b.iv.a	1785				What is the status of plans for purchasing wetlands bank credits? From what credit bank in the service area would they be purchased? How many credits? Requested Action: Answer questions; modify text as warranted.
1144	12.b.iv.a	1801				What "discharge structures" are planned to be constructed for water treatment plant and sanitary water treatment plant discharges? Requested Action: Answer question; modify text as warranted.
1145	12.b.iv.b	1805				Was the prior ditching for drainage on and near the proposed project site compliant with the WCA? Are the uplands and pasturelands of the site converted wetlands? Requested Action: Answer question; modify text as warranted.
1146	12.b.iv.b	1807				What analysis has been done by the Proposer regarding potential indirect impacts to downstream hydrology due to discharge of treated water, alteration of upstream tributary watersheds, and stormwater management? Requested Action: Answer question; modify text as warranted.
1147	12.b.iv.b	1810				For consistency with the rest of the EAW, reference "Questions 12(b)(i)(3) and 12(b)(ii)" as "Questions 12.b.i.3 and 12.b.ii". Requested Action: Modify text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1148	12.b.iv.b	1849				<p>New undefined term "laydown area." Not defined or mapped anywhere in the draft EAW other than in this section. Common usage in industry is a place to store tools and equipment, not a waste disposal site.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1149	13.c	1849				<p>Does not identify what hazardous wastes or petroleum products have been or would be stored at the "laydown area." Need specifics as to current and proposed future use of "laydown area." [See Table 3, proposing 21 acres of laydown area]</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1150	13.a	1853				<p>Drill cuttings will be buried in the laydown area? This assumes the cuttings will have chemical additives used for drilling. The cuttings' location, volume, and chemical constituents should be disclosed.</p> <p>Proposer should also state the regulatory authority for burial of drill cuttings.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1151	13.c	1885				<p>EAW listing of solid waste produced by project does not include reverse osmosis sludge or silt, fines, or sediments from mine contact water or industrial water. These materials are within the definition of the statute and rule cited in the EAW. Minn. Stat. § 116.06, subd. 22.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1152	13.c	1898				<p>EAW lacks full disclosure of hazardous materials. Start by providing a table of all applicable Federal and State hazardous substance and hazardous waste laws. See e.g. 40 CFR Part 261, 40 CFR Part 302, and Minnesota Rules 7045.0135.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1153	13.c	1924				<p>Note that Minn. Stat. § 116.06, subd. 11 states that hazardous waste includes wastes that "pose a substantial present or potential hazard to human health or the environment" when improperly stored, treated, transported, disposed of, or managed, including "explosives, flammables, oxidizers, poisons, irritants, and corrosives." Likely to be other hazardous wastes used and stored at the site.</p> <p>Requested Action: Advisory only.</p>
1154	13.d	1936				<p>Reference "(Minnesota Department of Transportation) MDOT" as "Minnesota Department of Transportation (MnDOT)".</p> <p>Requested Action: Modify text to address comment.</p>
1155	13.d	1970				<p>EAW identifies wastes generated by project: expired blasting agents, "solvent-contaminated wipes, waste grease, lubricants, anti-freeze, and solvents," and "used oil." Need to address the ways in which these materials in active use and as "used" materials will be contained or will contact either surface water, stormwater, or groundwater.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1156	14.a	1985				Add in Land Type Association (LTA) to add finer scale ecological context. LTAs capture finer scale information on landforms, soils, topography and vegetation. Requested Action: Advisory only; to be discussed in draft scoping decision document
1157	14.a	1991				Does area described as dominated by wetlands include the area above the proposed initial underground mine or area affected by surface? Cumulative impact analysis will require broader identification of ecological resources. Requested Action: Answer question; modify text as warranted.
1158	14	1994				Assuming one of the ditches is that proposed to receive the treated wastewater discharge, the PCA sampled the unnamed ditch (un-named trib) mentioned in v2 line 1203, and found pike, burbot, white sucker and central mudminnow. Requested Action: Consider comment; modify text as warranted.
1159	14.a	1994				When were ditches constructed to drain area wetlands? What is the basis for concluding that ditches do not support fish habitat after decades of use? Requested Action: Answer questions; modify text as warranted.
1160	14.a	1995				DNR notes that habitat suitable for fish "not present" would still likely support dace and mudminnow if nothing else. This same ditch/unnamed creek at downstream point has been sampled by MPCA and found gamefish too, including northern pike and burbot. It is very possible/likely that northern pike spawn in these flooded wetlands in spring. This information will need to be verified for use in the EIS. Requested Action: Advisory only.
1161	14.a	2003				More detailed information about survey data being collected, scope of the survey work and how indicators were selected should be provided. Requested Action: Advisory only.
1162	14.a	2003				Provide a more detailed description of the natural resource surveys. Please address the following: 1) geographic scope, does it extend beyond the immediate project area? 2) what survey methods will be used for different taxa and plant communities. Requested Action: Answer questions; modify text as warranted.
1163	14.b	2005				NHIS may not indicate state listed species in project area due to lack of survey, this may be needed to confirm presence or absence of suitable habitat or species presence. This should be acknowledged in the document. Requested Action:
1164	14.b	2011				Increased mercury release and methylation, traffic, noise, and air pollution may also affect threatened and endangered species. The presence of other suitable habitat is not the only issue. Requested Action: Consider comment; modify text as warranted.
1165	14.b	2011				There is no mention of state listed species in this section. Sharp-tailed grouse, sandhill cranes and trumpeter swans must be present along with a number of other vertebrate and invertebrate species. Requested Action: Consider comment; modify text as warranted

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1166	14.b	2030				<p>Maternity roost tree for northern long-eared bats is three miles west. Increased mercury in insects is a particular threat to bats and may have effects even if maternity roost tree is not removed.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1167	14.b	2055				<p>Wild rice is also found in downstream rivers and streams. Prairie River has significant rice stands.</p> <p>Requested Action: Consider comment; modify text as warranted</p>
1168	14.b	2057				<p>EAW states "Baseline data collection has been ongoing on or near several MPCA designated wild rice waters since 2008." Baseline data on what variables? By what methods?</p> <p>Requested Action: Advisory only.</p>
1169	14.b	2064				<p>Additional mining of Tamarack Intrusive Complex and impacts on these and other sensitive natural resources is reasonably foreseeable and should be analyzed in EIS.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1170	14.b	2064				<p>This paragraph and Figure 18 must also mention and depict Savanna State Forest in addition to the Wildlife Management Areas and MSBS.</p> <p>Requested Action: Add text to address comment.</p>
1171	14.b	2079		18		<p>While the EAW states the Project would result in the direct impact of approximately 263 acres of upland and wetland wildlife habitat and could further habitat fragmentation, there is no estimate of indirect impacts on wetlands and habitat from fragmentation, noise, pollution, light, odor, or changes to wetland hydrology.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1172	14.c	2083				<p>Compliance with numeric water quality standards does not mean lack of impacts. Minnesota has no numeric WQS for ionic pollutants, although it is known they kill aquatic insects and fish in the project ecoregion. Minnesota has no nitrate standard to protect aquatic life, although it is known nitrates kill local aquatic life and amphibians. Minnesota has no standard limiting sulfate to prevent internal loading of lakes with nutrients and mercury. To determine impacts on biota, EIS must consider cumulative effects on degradation of high water quality, toxicity, ecosystem effects, and sulfide cycle to evaluate potential for significant impacts along with project effects on hydrology.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1173	14.c	2086				<p>Indirect climate change impacts need to be addressed as well. The mining impacts to vegetation and ground and surface waters could extend significantly beyond the lifespan of this project. The time horizon for assessing climate impacts should be significantly longer, more in the range of 25-50 years.</p> <p>Requested Action: Consider comment; modify text as warranted</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1174	14.c	2088				<p>RGU has yet to determine what if any conclusions regarding potential project development and climate change may result in impacts to fish and wildlife resources would be provided in the Scoping EAW.</p> <p>Requested Action: Advisory only.</p>
1175	14.c	2091				<p>RGU has yet to determine what if any conclusions regarding potential impacts to lynx and wolf during project construction and operation would be provided in the Scoping EAW.</p> <p>Requested Action: Advisory only.</p>
1176	14.c	2095				<p>EAW claims "adverse effects on northern long-eared and tricolored bats are not anticipated from the Project." Tree clearing, noise, light, air pollution may all have adverse effects. Increased methylmercury in insects is also a potential risk.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1177	14.c	2106				<p>DNR notes the DSDD will likely require a full survey of the Site of Biological Significance for the project impact assessment. It is uncertain as to how intensively the area was surveyed, and what data went into the designation.</p> <p>Requested Action: Advisory for future discussion.</p>
1178	14.c	2110				<p>The EAW descriptions of nature and location of wild rice waters are inadequate, so delineation is likely to be flawed. It does not appear that any consultation with tribes was done. Due to cyclical nature of wild rice ecology, years of data are required for "baseline."</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1179	14.c	2114				<p>Measures should include monitoring of invasive species occurrences and effectiveness of treatments, and commitment to continue treatment and monitoring through the life of the project.</p> <p>Requested Action: Advisory.</p>
1180	14.c	2117				<p>Invasive species are not only the result of mechanical movement on construction equipment. Need evaluation of effects of pollutants on invasive species, such as effects of increased hardness from mining (calcium) on invasive zebra mussel species and effects of increased nutrient loading in displacement of wild rice by invasive plant species.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1181	14.d	2121				<p>The rail line would likely have impact on local populations of small mammals.</p> <p>Requested Action: Consider comment; modify text as warranted</p>
1182	14.d	2124				<p>No discussion of any thermal requirements for discharge. Downstream species, such as Burbot(identified downstream by MPCA), are thermally sensitive. Please include information on thermal changes(if any) and how minimal sedimentation from dust and increased flow in ditch might affect the habitat downstream.</p> <p>Requested Action: Consider comment; modify text as warranted</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1183	14.c	2124				DNR notes it is premature to conclude degree of any impacts to aquatic biota. It is likely the EIS will assess compliance with narrative regulatory requirements, and potential absence of numeric standards, in the impact assessment. Issue to be identified for the SEAW and DSDD. Requested Action: Advisory only.
1184	14	2131				DNR notes that site characterization is scale-dependent, which means it could be described differently for different issues and potentially-impacted resources. For example, the area proposed for direct development is predominantly upland however it is surrounded by wetland/peatlands that could also be impacted, both directly and indirectly. Requested Action: Advisory only.
1185	15	2137				Describe how the Project will coordinate with regional Tribal Historic Preservation Offices. Requested Action: Add text to address comment.
1186	15	2144				Other cultural resource sites, such as within Savanna Portage State Park, exist in the watersheds of the project and should be considered as hydrological models warrant. Requested Action: Consider comment; modify text as warranted.
1187	15	2153				Historical and cultural resources citations don't seem to reflect consultation with the tribes identified in lines 2124–2125. Comprehensive research of Aborigine, Dakota, and Ojibwe sites is required. Requested Action: Consider comment; modify text as warranted.
1188	15	2169				The document correctly notes that NHPA review will be required, most likely by the USACE under its Section 404 Permit. Potential mitigations whose efficacy could be evaluated in the EIS include Proposer commitments to: preserve any potential sites found; and not to bulldoze, otherwise destroy, or conceal potential historical or sacred sites. Requested Action: Advisory only.
1189	15	2182				The EAW states that the Project will alter the visual landscape of the project area "from a rural setting" to an "industrial setting." However, the EAW has not demonstrated how the Project will ensure the value is retained without degradation of the proposed site and downstream waters to water quality, wildlife, harvesters of wild rice and fish, health, recreation, economics, etc. This deficit should be corrected. Requested Action: Consider comment; modify text as warranted.
1190	16	2184				For consistency with the rest of the EAW, reference "Question 6(b)" as "Question 6.b". Requested Action: Modify text to address comment.
1191	16	2191				How is Savanna State Forest managed? Requested Action: Answer question; modify text as warranted.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1192	16	2191				Change "The Project's eastern boundary borders the Savanna State Forest..." to "The eastern portions of the Project's area is on the Savanna State Forest..." Requested Action: Modify text to address comment.
1193	16	2201				For consistency with the rest of the EAW, reference "Question 6(b)" as "Question 6.b". Requested Action: Modify text to address comment.
1194	16	2201				This does not discuss effects of continuous operation on wild rice harvesting, fishing, hunting, recreation, local residents. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1195	16	2206				For consistency with the rest of the EAW, reference "Question 6(b)" as "Question 6.b". Requested Action: Modify text to address comment.
1196	16	2209				Visual impacts from Savanna Portage State Park should be evaluated for impacts to Dark Skies and mitigations made if necessary Requested Action: Modify text to address comment.
1197	16	2213				How would the Project affect the Bortle Dark Sky rating? What standards does the Proposer propose to meet? Requested Action: Answer questions; modify text as warranted.
1198	16	2222				The EAW notes possible mitigation efforts, but there is no indication of what would or must be achieved. If the project will operate for 7–10 years, how is tree planting a meaningful screening barrier? Need EAW discussion of impacts on nocturnal wildlife, including bats. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1199	17	2247				In identifying air emissions, EAW must state all assumptions upon which the quantities of pollutants are based. In addition, need to evaluate combined total sulfur content of particulates and sulfur chemical emissions. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1200	17.a	2257				HAP analysis should provide both total and all individual HAPs, including but not limited to cobalt compounds, lead compounds, manganese compounds, mercury compounds, fine mineral fibers, nickel compounds. Must provide materials characterization and assumptions regarding efficacy of controls. Requested Action: Consider comment; modify text as warranted.
1201	17.a	2260				RGU notes the Final Scoping Decision will likely identify all potential emissions sources, which could include non-Minnesota project components. Requested Action: Advisory only.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1202	17.a	2264				<p>The EAW provides no description of the location, size, volume, or type of stack emissions, or the types of controls proposed. The basis for fugitive emissions estimates is also not disclosed</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1203	17.a	2265				<p>The EAW states that mine exhaust air would be emitted through stacks. It does not identify the use of best available technology for treatments. It also does not acknowledge fugitive emissions through the tunnel portals</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1204	17.a	2266				<p>The EAW must identify all air emissions parameters from explosives and mining, making explicit its assumptions regarding materials and run-of-mine sizing. The EIS should analyze whether the blasting configuration to allow railcar shipping without crushing the ore increases impacts from use of explosives.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1205	17.a	2269				<p>Non-uniform terminology must be corrected. Materials sent on railcars to North Dakota are higher and lower grade "ore" as suggested here, not Class 3 waste rock. Ore storage and loading must be detailed: e.g. footprint, height, location, flooring, duration of storage.</p> <p>Requested Action: Modify text to address comment.</p>
1206	17.a	2269				<p>Will ore unloading for storage take place within a building? How will dust and particles be prevented from escaping? Will ore be transferred to railcars within or outside a building? What is meant in the statement that ore will be transferred to railcars for "additional processing"? What processing, if any, will precede transfer?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>
1207	17.a	2271				<p>Non-standard terminology combining waste rock and aggregate as "backfill" is inconsistent with rules and misleading. The Project includes waste rock storage pile, crusher for waste rock and aggregate, and control of emissions, and must consider chemical composition of waste rock as well as fugitive particulates. Waste rock characterization as well as crushing and storage details are needed. Would waste rock pile be covered?</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1208	17.a	2274				<p>The EAW refers to "control equipment as needed to meet applicable regulatory requirements for stack, fugitive, and engine emissions." The EAW lacks information on specific regulatory requirements that would be met or air control technologies. In addition to water, what chemicals would be used to minimize dust from waste rock pile?</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1209	17.a	2282				<p>What is the basis of this expectation that no PSD permit requirements would be triggered? Which Class 1 airsheds have been considered?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1210	17.a	2288				<p>Non-standard terminology suggests improper regulatory classification. Crushing of waste rock (not "development rock") is not likely to be governed by cited regulation for non-metallic (e.g. gravel) mining. 40 CFR Part 60, subp. OOO. Metallic mining is governed by 40 CFR Part 60, subp. LL.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1211	17.a	2290				<p>The EAW does not discuss energy needs or sources clearly. Is this unknown to the project Proposer or just not disclosed? Is the EAW proposing to start mine construction before substation and transmission lines are in place? Energy sources and uses are needed to evaluate feasibility, air emissions, noise, odor, climate impacts.</p> <p>Requested Action: Answer questions; modify text as warranted.</p>
1212	17.a	2290				<p>The EAW does not identify number, type, size, fuel, hours of operation, or any other clear metric for equipment use in or outside the mine during either construction or operations. This information is needed to scope EIS.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>
1213	17.a	2293				<p>Project expects to be HAP area source, below Title V thresholds. EAW should state assumptions, including predicted sources, efficacy of controls, and thresholds.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1214	17.a	2298				<p>State assumptions, including materials characterization, predicted efficacy of controls, and all fuel combustion sources that could emit mercury on which estimate is based as to total mercury emissions.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1215	17.a	2304				<p>The EAW should provide a map of Class I areas and disclose how air emissions screening, increment, and transport modeling analyses are proposed to be done.</p> <p>Requested Action: Consider comment, add graphic.</p>
1216	17.b	2321				<p>RGU notes the Final Scoping Decision will likely identify all potential emissions sources, which could include non-Minnesota project components.</p> <p>Requested Action: Advisory only.</p>
1217	17.b	2325				<p>DNR notes that the EIS will require specific estimates of vehicle use. These will likely be conservative. Future requirement of DSDD.</p> <p>Requested Action: Advisory only.</p>
1218	17.c	2335				<p>Will fugitive dust contaminate water? If so, with what pollutants and how will water be treated before discharging to the environment?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>
1219	17.c	2336				<p>DNR notes that the DSDD will likely consider geochemical characterization of particulates in impact assessments.</p> <p>Requested Action: Advisory only.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1220	17.c	2336				<p>Non-standard terminology and failure to characterize materials in description of fugitive dust must be corrected. Aggregate for CRF would produce particulate emissions. Waste rock would also contain sulfate and toxic metals. "Overburden" may also have elevated sulfate and toxic metals, depending on depth and location.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1221	17.c	2350				<p>The EAW states explosives and diesel are expected to be primary sources of odor. It does not suggest any criteria to measure or mitigate odor impacts from explosives and diesel trucks. Explosives and diesel exhaust also contain hazardous air pollutants.</p> <p>Requested Action: Consider comment, modify for clarity</p>
1222	17.c	2358				<p>The EAW excludes rail transport and ore processing from GHG emissions/carbon footprint.</p> <p>Requested Action: Add text to address comment.</p>
1223	18.a.iii	2418				<p>Premature to conclude that the GHG emissions from the project will have little impact on achieving the Next Generation Energy Act goals as the cumulative impact from adding the GHG emissions from the Talon project to those from other new projects in MN will increase the amount of time it takes MN to achieve the Next Energy Act Goals. Will need to discuss cumulative GHG impacts in the EIS.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>
1224	18.a	2358				<p>RGU notes the Final Scoping Decision will likely identify all potential emissions sources to assess GHG impacts, which could include non-Minnesota project components.</p> <p>Requested Action: Advisory only.</p>
1225	18.a	2366				<p>Change "off-road" to "non-road".</p> <p>Requested Action: Modify text to address comment.</p>
1226	18.a	2377				<p>Change "Off Road" to "Non-road".</p> <p>Requested Action: Modify text to address comment.</p>
1227	18.a	2377	15			<p>Emissions analysis may be different for Minnesota than for SCAQMD. Fuel content may differ and fuel consumption to achieve the same mileage is higher in Minnesota's colder climate.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>
1228	18.a	2377	15			<p>RGU notes the Final Scoping Decision will likely identify all potential emissions sources to assess GHG impacts, which could include non-Minnesota project components. This could be part of the alternatives analysis.</p> <p>Requested Action: Advisory only.</p>
1229	18.a	2382	16			<p>Does "2013 Wetlands Supplements for wetlands and sources/sinks for uplands" for operations GHG emission evaluation consider indirect impacts to wetlands affecting carbon sequestration? If so, how?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1230	18.a	2382	16			Emissions analysis may be different for Minnesota than for SCAQMD. Fuel content may differ and fuel consumption to achieve the same mileage is higher in Minnesota's colder climate. Requested Action: Consider comment; modify text as warranted.
1231	18	2391				Peatlands have the greatest carbon capture capacity of all wetlands. Peatlands are 3% of the worlds land surface and capture 33% of the earths carbon. Requested Action: Advisory only.
1232	18.b.i	2392				Mitigation measures identified are minor and indefinite, e.g. use of green electricity and electric vehicles "if available and appropriate" Requested Action: Consider comment; modify text as warranted.
1233	18.b.i	2392				There are no references to any proposed carbon sequestration into bedrock. Has this option been rejected by the project Proposer? If not, what is the location and plan for the current concept? Requested Action: Answer questions; modify text as warranted.
1234	18.b.i	2396				How does "maximizing the use of uncemented rockfill" reduce GHG? What are consequences in terms of strength, subsidence, fugitive emissions, and/or seepage? Requested Action: Answer questions; modify text as warranted.
1235	18.b.i	2400				Change "off-road" to "non-road". Requested Action: Modify text to address comment.
1236	19	2423				The EAW should acknowledge that the EIS will provide analyses on impacts of noise, vibrations, and air blasting on workers. Requested Action: Add text to address comment.
1237	19	2423				Missing analysis on impacts of vibrations and air blast from explosions and vibrations from the tunnel boring machine, including impacts on fractures and faults, groundwater inflow, existing drinking water wells, and mine features, such as the TBM access tunnel. Requested Action: Consider comment; modify text as warranted.
1238	19	2423				This section is missing any data on existing decibel levels and at what time of day. The EAW does not describe 24/7/365 decibel impacts from the project, or locations of sensitive receptors, effects on residents, exercising of ceremonies and treaty-reserved rights, recreation, or wildlife. Requested Action: Consider comment; modify text as warranted.
1239	19	2456				Other than a brief mention of rail frequency, Transportation section does not quantify any other aspects of rail transportation (number of cars, total per year, etc.) or discuss impacts on rail transportation, rail congestion, or conflicts with auto or truck transportation. Requested Action: Consider comment; modify text as warranted.
1240	20	2463				Change "MDOT" to "MnDOT". Requested Action: Modify text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1241	20.a	2464				Change "MDOT" to "MnDOT". Requested Action: Modify text to address comment.
1242	20.a	2486				Traffic impact study does not reference rail. Requested Action: Consider comment; add text about rail.
1243	20.a	2500				RGU notes that cumulative potential effects could include the Tamarack Intrusive Complex-wide mining. The scale and the sensitive features affected by mining the Tamarack Intrusive Complex would be considered with respect to all natural resource impacts, human health, exercise of treaty-reserved rights, and climate impacts. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.
1244	21	2501				At a minimum, water quality impacts from existing industries including peat mining operations nearby must be considered. Requested Action: Consider comment; modify text as warranted.
1245	21.a	2509				The items listed by the Proposer as discussion points about scope are already required to be within scope. Impacts already must include local, regional, downstream, and State air quality to the extent potentially affected and must include long-term reclamation and post-closure. Question 21.a is asking what other cumulative potential impacts beyond this baseline scope requirement need to be examined. Requested Action: Consider comment; modify text as warranted.
1246	21.a	2516				RGU notes that if the speculated CO2 sequestration project in the southern portion of the Tamarack Intrusive Complex is determined to constitute a reasonably foreseeable action, then it will be assessed as part of determining the projects potential cumulative effects. Requested Action: Advisory only.
1247	21.b	2519				Underground mining of 224.9 acres is less than one percent of "district-scale" Tamarack Intrusive Complex resource controlled by the project Proposer. Mining of the Tamarack Intrusive Complex could be considered reasonably foreseeable and the EIS should include analysis of cumulative potential effects of mining at the scope project Proposer have represented elsewhere. Requested Action: Advisory only.
1248	21.b	2524				Other than Premier Horticulture, the EAW states: "At this time there are no other known projects within the vicinity that may interact with the proposed Project." Standard for cumulative impacts is reasonably foreseeable not "known." Requested Action: Consider comment; modify text as warranted.
1249	21.b	2532				Change "potential cumulative impacts" to "cumulative potential effects" for consistency with rest of the EAW. Requested Action: Modify text to address comment.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table	Figure	Graphic	Round 2 Comment and Requested Action 2/4/2024
1250	21.c					<p>Change "potential cumulative impacts" to "cumulative potential effects" for consistency with rest of the EAW.</p> <p>Requested Action: Modify text to address comment.</p>

List of Abbreviations and Acronyms

ABA	Acid base accounting
AERA	Air emissions risk analysis
ANFO	Ammonium nitrate and fuel oil
BAL	Bentonite amended soil liner
BMP	Best Management Practices
CCL	Compacted clay liner
CEMS	Continuous emission monitoring system
CO	Carbon Monoxide
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide Equivalent
COPC	Contaminants of potential concern
CRF	Cemented rock fill
DSDD	Draft Scoping Decision Document
DNR	Minnesota Department of Natural Resources
EAW	Environmental Assessment Worksheet
EIS	Environmental Impact Statement
EMP	Elongate Mineral Particle
EPA	Environmental Protection Agency
EQB	The Environmental Quality Board
FEMA	Federal Emergency Management Agency
GCL	Geosynthetic clay liner
GHG	Greenhouse gas
GM	Geomembrane
Gpd	Gallons per day
Gpm	Gallon per minute
Gpy	Gallons per year
H ₂ S	Hydrogen sulfide
HAP	Hazardous Air Pollutant
HCN	Hydrogen Cyanide
IPaC	Information for Planning and Consultation
Kv	Kilovolt
LGU	Local government unit
MCE	Minnesota Conservation Explorer
MDH	Minnesota Department of Health

ABA	Acid base accounting
MFAA	Minnesota Field Archaeology Act
mg/L	Milligrams per liter
MIAC	Minnesota Indian Affairs Commission
MLARD	Metal leaching and acid rock drainage
MnDOT	Minnesota Department of Transportation
MPCA	Minnesota Pollution Control Agency
MSHA	Mine Safety and Health Administration
NH3	Anhydrous Ammonia
NHIS	National Heritage Information System
NHPA	National Historic Preservation Act
NIOSH	National Institute for Occupational Safety and Health
NMOC	Nonmethane Organic Compounds
NO2	Nitrogen dioxide
NOX	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
NPR	Neutralization potential ratio
NRCS	National Resource Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
OSA	Office of the State Archaeologist
OSHA	Occupational Safety and Health Administration
QA/QC	Quality Assurance/Quality Control
RGU	Responsible Government Unit
RO	Reverse Osmosis
SDS	State Disposal System
SVOC	Semi-volatile organic compound
SWPPP	Stormwater Pollution Prevention Plan
TBM	Tunnel Boring Machine
TCP	Traditional Cultural Properties
TEP	Technical Evaluation Panel
THPO	Tribal Historic Preservation Officer (THPO)
TIC	Tamarack Intrusive Complex
TSP	Total Suspended Particulates
UIC	Underground Injection Control
WCA	Wetland Conservation Act
WMA	Wildlife Management Area
WWTP	Wastewater Treatment Plant