

# Tamarack Mining Project EIS Scoping

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

On December 12, 2024, Talon Nickel (USA) LLC, (Talon) submitted a revised 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.

The following two tables include comments made during the first two rounds of RGU review and Talon's responses. The Round One Comment Responses Table includes the RGU's comment from Talon's initial submittal, Talon's response, the RGU's follow up comments sent, and Talon's response to the follow-up comments submitted December 12, 2024. The Round Two Comment Responses Table (p. 209) includes the DNR's comments sent February 4, 2024, on Talon's second submittal and Talon's responses submitted December 12, 2024. A list of abbreviations and acronyms is provided after the tables.

### Round One Comment Responses Table

Comment No.	EAW Item	Starting Line No.	Table; Figure; Graphic	Round 1 Comment and RGU Request 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Request 2/4/2024	Talon Response and Treatment in EAW 12/12/2024
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
2	5	39	Table 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
3	5	39	Table 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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4	5	100	Figure 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.  Requested Action: Edit figure to include inset scaled to regional location of project.	Figure 1 has been updated.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
5	5	103	Figure 4	Figure 4. The figure would benefit from addition of a few of the larger, basic facility labels so the reader does not have to 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
6	5	107	Figure 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.	Thank you for your follow-up comment regarding the terminology used in Figure 8. We understand your suggestion to refer to it as a "rock unit map" rather than "bedrock geology." However, the map source cited, "Geologic Map of Minnesota - Bedrock Geology, Minnesota Geological Survey, State Map Series S-21," explicitly refers to the data as "bedrock geology."  Could you clarify the rationale behind the recommendation to adopt the term "rock unit map" instead? Understanding the basis for this suggestion would help us determine whether the terminology better aligns with the intent and standards of the referenced source material.  At this time, we plan to maintain the original terminology, as it reflects the language used by the source. However, we remain open to further discussion if additional context supports the need for this change.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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9	6.a	166		<p>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.</p> <p>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.</p>	<p>Comment is noted.</p> <p>Talon will participate in future discussions on this topic.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
10	6.a	166		<p>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.</p> <p>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.</p>	<p>Comment is noted.</p> <p>The Project will participate in future discussions on this topic.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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"> <li>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.</li> <li>2. Describe the approximately 263.3 acres of surface boundaries (which may not add-up with the current descriptions provided; requires checking).</li> <li>3. Describe the approximately 224.9 acres of underground boundaries.</li> </ol> <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>	<p>The amended EAW language maintains the intent of the original response, but now in context to the amended design.</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>	<p>Comment is noted.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Thank you for your comment. The graphics have been significantly revised to clarify material movement throughout the site. Combining Graphics 9, 10, and 11 into a single, simplified view may risk overgeneralizing the design and potentially add confusion during the review process. Each graphic serves to illustrate specific aspects of the material flow and is intended to provide detailed and clear information to support the review.</p>

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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>	<p>The amended EAW language remains aligned with the intent and substance of the original response, and has been updated in context to the amended design.</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 Lines 183-186.</p> <p>Requested Action: Consider comment; edit text.</p>	<p>Comment is noted.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
24	6.b	187		<p>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?</p> <p>Requested Action: Respond to question; clarify text as warranted.</p>	<p>Comment is noted.</p> <p>See Responses to Comments 13 and 22.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>The amended EAW language remains aligned with the intent and substance of the original response, and should now be understood within the context to the amended design.</p>

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25	6.b	196	Figure 1, 2; Graphic 1	<p>The surface facilities outlines in Graphic 1 do not appear to be consistent with the "surface boundary" in Figures 1 or 2. Confirm consistency.</p> <p>Requested Action: Consider comment; edit figure as warranted.</p>	<p>Graphic 1 was modified to align better with Figures 1 and 2.</p> <p>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)."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>The amended EAW language remains aligned with the intent and substance of the original response, and should now be understood within the context to the amended design.</p>
26	6.b	196	Figure 2; Graphic 1	<p>It is not clear how the outline of the areas represented on Graphic 1 is correspond to the outline on Figure 2. Confirm consistency.</p> <p>Requested Action: Consider comment; edit figure as warranted.</p>	<p>See Response to Comment #25.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>The amended EAW language remains aligned with the intent and substance of the original response, and should now be understood within the context to the amended design.</p>
27	6.b	196	Graphic 1	<p>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</p> <p>Requested Action: Consider comment; edit figure as warranted.</p>	<p>Graphic updated as requested.</p> <p>The dark blue polygons show the surface projection of the underground mine workings as they relate to the surface facilities.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>The amended EAW language remains aligned with the intent and substance of the original response, and should now be understood within the context to the amended design.</p>
28	6.b	200	Figure 1	<p>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.</p> <p>Requested Action: Consider comment; edit figure as warranted.</p>	<p>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."</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>The amended EAW maintains the intent of the original response, but now in context to the amended design.</p>
29	6.b	200	Figure 3; Graphic 2	<p>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.</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>The Project has standardized terminology across graphics, figures, F37tables, and texts.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>



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30	6.b	202		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.  Requested Action: Advisory only.	Comment is noted.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
31	6.b	203		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.  Requested Action: Consider comment; add detail if available. If not available, then the issue flagged for 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.	Thank you for the comment. Details regarding the scale of the project components have been added to "Project Magnitude" table.
32	6.b	204	Graphic 2	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.  Requested Action: Consider comment; edit document as needed.	Comment is noted.  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."	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
33	6.b	207		Should provide approximate acreage  Requested Action: Consider comment; edit document as needed.	The following text has been added to the Project Description in the referenced section.  "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."	Resolved.  Requested Action: None.	The amended EAW maintains the intent of the original response, but now in context to the amended design.
34	6.b	212		Typo: "For these activities, an offset distance of at approximately 200 feet has been applied ..."  Requested Action: Make edit.	Comment is noted.  The EAW is edited.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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 to be derived from the presence of these metals in the concentrate.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
36	6.b	217		<p>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)?</p> <p>Requested Action: Answer question; modify text if warranted.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
37	6.b	217		<p>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.</p> <p>Requested Action: Consider comment; edit document as needed.</p>	<p>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.</p>	<p>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).</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for your comment regarding the description of mine life phases. Additional detail on construction (Section 6.4) and operational phases (Section 6.15) is included in the EAW to support project understanding. Reclamation and closure is discussed in Section 6.22; however, a specific timeframe will be evaluated and provided as part of the Environmental Impact Statement (EIS) and finalized during the Permit to Mine (PTM) process.</p>

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38	6	218		<p>What are the North Dakota project components? What metal concentrate products are planned to be produced?</p> <p>Requested Action: Answer questions.</p>	<p>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.</p> <p>The concentrate products will be a copper concentrate and a nickel concentrate. The iron byproduct is contained within the nickel concentrate.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
39	6.b	222		<p>Include the Temporary Modular Water Treatment plant as a facility element</p> <p>Requested Action: Consider comment; edit document as needed.</p>	<p>Comment is noted.</p> <p>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.</p>	<p>Follow up – The proposer is encouraged to provide site layout figures of the different phases of construction, including the temporary modular water treatment plant.</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for your question. Precise layouts and sequencing of the construction activities will be developed over time, in alignment with EIS and permitting regulations. Construction activities, including temporary facilities, would occur within the boundaries of the project disturbance area as described in the Environmental Assessment Worksheet (EAW)</p>
40	6.b	227		<p>Bullet 3, Line 4: '... an offset distance of at approximately...' should read '... an offset distance of approximately...'</p> <p>Requested Action: Consider comment; edit document as needed.</p>	<p>See Response to Comment #34.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
41	6.b	229		<p>There appear to be multiple separate treatment plants needed for the site: contact water, non-potable water, potable water, &amp; 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>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<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.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>In light of the amended design Talon has updated the descriptions of ore storage and rail loadout areas to align with the new design.</p>
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>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>See Response to Comment #46</p>	<p>Follow up. Will season be considered in project activity timelines? Especially as peatlands can be more or less sensitive to impacts depending on season?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your follow-up question. Seasonal considerations have been factored into the project timeline to mitigate potential impacts on sensitive areas, such as peatlands. Construction is planned to commence after the winter thaw, contingent upon the receipt of the Permit to Mine. The primary construction activities in the main zone are not expected to disturb peat.</p>

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46	6.b	245		<p>Provide estimated years/months for construction.</p> <p>Requested Action: Consider comment; edit document.</p>	<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.</p>	<p>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.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has updated the following text:</p> <p>EAW December 2024 "Conversion of the wetlands to uplands for the railway spur would use appropriate materials (e.g. coarse rock) or features (e.g. culverts) to enable water to flow across and/or under the developed surface to facilitate water movement between each side of it and address the potential for differences in water levels and/or other hydrological impacts. [R1_Cmt_#52] [R1_Cmt_#56] [R1_Cmt_#585] [R2_Cmt_#808] [R2_Cmt_#811] [R2_Cmt_#812]"</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>



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59	6.b	266	Graphic 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has amended the EAW as follows:</p> <p>EAW December 2024  "A leakage detection system for the Decline Ramp is not planned, as it is not typical for this type of tunnel. The mine's underground water management system during operations would collect water, equipment, and general usage. These waters would be pumped to surface and routed to the Contact Water Treatment Plant. Detailed inspections of the Decline Ramp would be performed quarterly. Repairs would be carried out in accordance with General Plans of Operations.  [R2_Cmt_#60] [R2_Cmt_#61] [R2_Cmt_#62] [R2_Cmt_#63] [R2_Cmt_#67] [R2_Cmt_#87]"</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>	<p>Please see the response to comment number 60.</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>	<p>Thank you for your question. Talon has reviewed this comment in light of the amended design. The Bedrock section of the Decline Ramp would no longer use precast concrete rings as the liner; instead, the amended design incorporates a shotcrete liner, which would be left in place upon mine closure.</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>	<p>Thank you for your question. Talon has reviewed this comment in light of the amended design. The Decline Ramp would no longer use precast concrete rings as the liner; instead, the amended design incorporates a shotcrete liner, which would be left in place upon mine closure.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Thank you for your question. The design has been updated and would use Sequential Excavation Methods (SEM) for tunneling, Deep Soil Mixing (DSM) and a Cement Bentonite (CB) cell to minimize groundwater inflow, along with a shotcrete liner. This approach would isolate and limit potential groundwater inflow during construction and operations, inflow rates would be expected to remain consistent with previous estimates. The details are provided in the EAW project description.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>With the amended design, the Decline Ramp is engineered for resilience, requiring minimal maintenance while supporting service loads. The design approach incorporates robust systems commonly used in tunnels that experience heavy vehicle, impact, and vibration loads, such as those in light rail and subway tunnels.</p> <p>In alignment with Mine Safety and Health Administration (MSHA) detailed inspections of the Decline Ramp would occur quarterly. Additionally, the continuous presence of mine personnel in the tunnel during operations will provide consistent oversight, enabling early detection of any potential issues. Further details on liner design and monitoring will be included in the EIS data submittal.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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"> <li>-The typical steering capabilities of a TBM in this diameter range;</li> <li>-The typical segmental lining design and performance in this diameter range;</li> <li>-Documented successful installation this geometry on previous TBM projects</li> <li>-The minimum amount of tunneling to reach the target area at the maximum gradient allowed by the mine trucks.</li> </ul> <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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Although the updated design initiates blasting at a shallower depth, the previous response remains applicable. Ensuring that any ground vibrations adhere to Minnesota Permit to Mine standards, with vibration and noise studies informing the EIS.</p>

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73	6	281		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.  Requested Action: Answer question.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
74	6.b	289		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.	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.  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.	Resolved.  Requested Action: None.	Thank you for your question. Talon has reviewed this comment in light of the amended design. The Bedrock section of the Decline Ramp would no longer use precast concrete rings as the liner; instead, the amended design incorporates a shotcrete liner, which would remain in place upon mine closure. The shotcrete liner, as a permanent feature, is expected to have no significant effect on bulk permeability, hydraulic gradients, or flow direction at the project scale.
75	6.b	290		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.  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.	Comment is noted.  See Response to Comment #61.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Please see the response to comment number 63 and 74.
76	6.b	292		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.  Requested Action: Consider comment; edit document as needed.	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.  Lines 498–502 were updated to provide more clarity.	Resolved.  Requested Action: None.	In light of the amended design, overburden material excavated from the Portal and SEM sections of the Decline Ramp would consist of glacial till. This material would be hauled to the surface and transported off-site to a nearby landfill for appropriate disposal. The updated project design reflects this new approach to managing overburden material.

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77	6.b	292		How long will be the overburden be set aside?  Requested Action: Answer question.	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.	Comment 77 has not been adequately addressed. Consider adding text that defines what the proposer means by "temporary".  Requested Action: Consider comment; modify text as warranted.	Please see the response to comment number 76.
78	6.b	292		How much of the overburden will be set aside and how much will be used as a backfill for the box cuts?  Requested Action: Answer question.	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.	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.  Requested Action: Consider comment; modify text as warranted.	Please see the response to comment number 76.
79	6.b	292		At mine closing, will these box cuts be removed and the stored overburden used to refill the opening?  Requested Action: Answer question.	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.	Comment 79 has not been adequately addressed. Consider adding text that states the overburden use for refill will be evaluated in the EIS.  Requested Action: Consider comment; modify text as warranted.	Thank you for your follow-up. The EIS data submittal will include an overview of the closure method, with considerations for backfilling and restoring the area. Specifically, the plan would be for the Decline Ramp to be sealed, the sheet pile tunnel cover removed, and the box cut area then backfilled. Additional details would be included in the Reclamation and Closure Plan as part of the Permit to Mine process.
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;	Please see the response to comment number 76.



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						modify text as warranted.	
81	6.b	292		<p>What is the overburden's soil chemistry; is it high in sulfide-bound minerals?</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Thank you for the comment. The overburden material excavated is not expected to contain sulfide-bound minerals. Also, Please see the response to comment number 76.</p>
82	6.b	292		<p>Where is excavation material placed from "box-cut" construction and what is done with groundwater pumped during construction (prior to liner installation).</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Thank you for your comment. The amended project design addresses the handling of overburden material excavated from the Portal and SEM sections of the Decline Ramp. This material, primarily glacial till, would be transported to the surface and removed off-site to a nearby landfill for appropriate disposal. This updated approach is reflected in the amended EAW, which now includes an estimate of the volume of overburden to be managed. Additionally, the excavation support system will be designed to minimize groundwater inflow during construction, as outlined in the updated project documentation. 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, details will be included in the EIS data submittal.</p>
83	6.b	298		<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>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Please see the response to comment number 74.</p>

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84	6.b	312		<p>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.</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, as necessary, this issue in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>	<p>Thank you for your comment. The amended project design no longer includes the use of a pressurized-face Tunnel Boring Machine (TBM). The revised approach eliminates the potential impacts previously associated with the TBM's operation. As a result, this comment is no longer applicable</p>
85	6.b	312	Figure 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>	<p>Thank you for your comment. In light of the amended design, the project has shifted focus from using a Tunnel Boring Machine (TBM) to the use of a Mobile Tunnel Borer (MTB). The amended Environmental Assessment Worksheet (EAW) provides further details on the proposed MTB and its anticipated operation, including information on assembly and maintenance requirements.</p>
86	6.b	312	Figure 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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>

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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>	<p>In light of the amended design, Talon has reviewed this previous response and confirms that the principles regarding settlement monitoring and control would remain applicable. While the tunneling methodology has been updated, the project will continue to incorporate settlement limits proposed during the feasibility design stage, with further refinements made if necessary during detailed design. As before, no surface settlements are anticipated in the rock sections of the alignment.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
89	6.b	337		<p>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.</p> <p>Requested Action: Edit document.</p>	<p>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.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Thank you for the comment. The Project will adopt the terminology in Minnesota Rules Chapter 6132 to refer to development rock and will revise the language accordingly.</p>

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90	6.b	338		<p>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.</p> <p>Requested Action: Answer question. Response will inform development of Draft Scoping Decision Document.</p>	<p>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.</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>Suggest stating in EAW why it was determined that a liner is not needed.</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for the comment; however, the updated project design no longer includes an overburden storage area, making this inquiry no longer applicable.</p>
91	6.b	338		<p>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.</p> <p>Requested Action: Advisory only. Permitting consideration.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
92	6.b	340		<p>what is the liner design for the backfill materials storage area?</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 for the purpose of scoping.</p> <p>Requested Action: None.</p>	<p>Thank you for your question; however, the updated project design no longer includes a backfill materials storage area, making this inquiry no longer applicable.</p>
93	6.b	340		<p>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.</p> <p>Requested Action: Consider comment; edit text as needed.</p>	<p>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.</p> <p>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.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Waste rock would be hauled to the surface and staged for use in preparing Cemented Rock Fill (CRF) material. A 4,000-ton buffer would be maintained for this purpose. When waste rock is unavailable for CRF production, aggregate sourced from a commercial gravel pit and staged adjacent to the Ore Transfer Building would be used. Further details on this process are included in the amended EAW under the project description. The geochemical characterization of waste rock is an ongoing component of the Materials Characterization Program.</p>

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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>	<p>Thank you for your questions; however, the updated design does not use a tunnel boring machine (TBM) for developing the a looped Decline Ramp, making this inquiry no longer applicable.</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>	<p>Thank you for your comment. To clarify, the project design has been updated, and the Tunnel Boring Machine (TBM) is no longer part of the construction methodology. However, regardless of the specific excavation methods used, noise and vibration effects will be assessed as part of the EIS data submittal</p>

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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>	<p>Please see the response to comment number 101.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Thank you for your question. At this time, a temporary contact water treatment plant is not anticipated during the construction of the Portal and SEM sections of the Decline Ramp through glacial till (overburden). Water would be directed to the stormwater management system before being released. The Project does not consider this water to be contact water. The EIS data submittal, however, would provide additional analysis regarding the level of treatment required for discharge. By the time construction reaches the bedrock section of the Decline Ramp and begins generating contact water, the permanent contact water treatment plant would be commissioned. The project anticipates approximately 12 months will be required to construct and commission the Contact Water Treatment Plant.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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103	6.b	347		<p>What type of treatment is proposed for the modular water treatment plant that will be used during construction? What contaminants are expected to be elevated in construction contact water and what contaminants will the modular water treatment system address? Where will the system be located (not currently indicated in any figures/graphics)? Where will the water be discharged? How were discharge quality/quantity objectives developed?</p> <p>Requested Action: Consider comment; edit text with additional detail for clarity.</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>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 item as part of developing the Draft Scoping Decision Document</p>	<p>Please see the response to comment number 39.</p>
104	6.b	353		<p>Any long term consequences of the TBM, both during the mine operation and after mine closure, would need to be considered.</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, as necessary, this issue in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>	<p>Thank you for your question. The amended project design has eliminated using a TBM, making this specific inquiry no longer applicable.</p>



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105	6.b	355		<p>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.</p> <p>Requested Action: Consider comment; provide examples if available.</p>	<p>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:</p> <ul style="list-style-type: none"> <li>-Rondout-West Branch Bypass Tunnel, NY (USA): 2.6-mile-long, 14-foot diameter, 900 feet cover</li> <li>-Kanehe / Kailua Sewer Tunnel, HI (USA): 3.3-mile-long, 10-foot diameter, 600 feet cover</li> <li>-Grosvenor Coal Decline Tunnel, (AUS): Twin tunnels, 4,800-feet long, 22-foot diameter, 500 feet cover</li> <li>-Sound Transit North Link Tunnel, WA (USA): 3.8-mile long, 22-foot diameter, 140 feet cover</li> <li>-Diamond Fork Tunnel, UT (USA): 4.3-mile long, 11-foot diameter, 1,000 feet cover</li> <li>-Port Mann Water Supply Tunnel, BC (CAN): 3,300-feet long, 11-foot diameter, 180 feet cover (under Fraser River)</li> <li>-Brightwater , WA (USA):3.8-mile long, 13-foot diameter, 450 feet cover</li> </ul>	<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your question. The amended project design has eliminated using a TBM, making this specific inquiry no longer applicable.</p>
106	6.b	355		<p>Have TBMs been used for other mining projects? If first time, more explanation as to why this technique is being used instead of other underground mining techniques.</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Thank you for your question. The amended project design has eliminated using a TBM, making this specific inquiry no longer applicable.</p>
107	6.b	358		<p>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?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>See Response to Comment #109</p>	<p>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.</p> <p>Requested Action: Add text to address comment.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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108	6.b	358		<p>What are the noise and/or vibrational impacts to the area from use of conventional drill-and-blast excavation methods?</p> <p>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.</p>	<p>Comment is noted.</p> <p>See Response to Comment #109</p>	<p>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.</p> <p>Requested Action: Add text to address comment.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
109	6.b	358		<p>In the mining cycle, explosive ammonium nitrate and fuel oil (ANFO) are used. At a high level what are the types of environmental impacts associated with use of ANFO?</p> <p>Requested Action: Answer question. The response can be considered in development of the Draft Scoping Decision Document.</p>	<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 &amp; 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</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>The information has been revised to reflect the shallower depth at which blasting will occur. Specific details regarding the updated blasting depth and associated measures are provided in the amended EAW submittal.</p> <p>Drill-and-blast mining will begin roughly 100 ft (30.5 m) below surface, starting from near the bottom of the Decline Ramp. 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 &amp; 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. 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</p>

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					<p>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>		<p>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>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>The EAW text has been updated to indicate that an estimate of particulate capture efficiency will be provided in the EIS data submittal once additional engineering work is completed.</p> <p>EAW December 2024 "A leakage detection system for the Decline Ramp is not planned, as it is not typical for this type of tunnel. The mine's underground water management system during operations would collect water, equipment, and general usage. These waters would be pumped to surface and routed to the Contact Water Treatment Plant. Detailed inspections of the Decline Ramp would be performed quarterly. Repairs would be carried out in accordance with General Plans of Operations. [R2_Cmt_#60] [R2_Cmt_#61] [R2_Cmt_#62] [R2_Cmt_#63] [R2_Cmt_#67] [R2_Cmt_#87]"</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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"> <li>-Dilution of underground vehicle emissions</li> <li>-Rapid clearance of underground dust generated in active working areas where personnel are present</li> <li>-Rapid clearance of blasting gases and dust so that personnel can return underground after blasting</li> <li>-Avoidance of excessively high local air velocities which could result in excessive entrainment of settled dust, or difficulty for personnel walking.</li> </ul>	<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>	<p>In light of the amended design, ongoing air modeling and updates to the mining rate estimate indicate a total airflow capacity of 784,000 cfm. This total estimated airflow is now included in the amended EAW project description.</p>
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 &amp; 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"> <li>- Utilizing wet-drilling processes which inject water through the drill bit as blastholes are being drilled.</li> <li>- Thoroughly wetting down the piles of blasted rock with a water hose before handling or loading.</li> <li>- Using water trucks to dampen haulage routes to prevent generation of roadway dust.</li> </ul> <p>The mine ventilation system will provide sufficient</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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					<p>airflow velocities to rapidly clear any concentration of dust generated in an individual work area:</p> <ul style="list-style-type: none"> <li>- 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.</li> <li>- Personal respirators would also be worn for specialty operations which may generate dust, such as spraying shotcrete.</li> </ul>		
116	6.b	358		<p>In bolting, there may be situations where grouted bolts will be used. At a high level are there types of environmental impacts known to be associated with the use of the cementitious or resin grout?</p> <p>Requested Action: Answer question. The response can be considered in development of the Draft Scoping Decision Document.</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Thank you for your question. In the revised mine design, the connection between the Portal and the Ore Transfer Building is expected to minimize noise emissions, making the use of sound-dampening curtains unnecessary. The Project will continue to evaluate noise levels and any need for additional mitigations as part of the EIS data submittal.</p>

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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>	<p>Thank you for your comment and for providing additional details. Based on the 2014 Seismic Hazard Map of Minnesota, which shows that Aitkin County has a low seismic risk, there are currently no plans to conduct a dedicated seismic baseline study specific to the project site. The geological features, such as Precambrian dikes and nearby thrust faults, are noted, but they do not alter the low seismic risk classification for this area.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
123	6.b	365		<p>A likely project goal is to accurately blast along the margins of the ore body to minimize the amount of waste rock that is removed. The EIS would likely require detail on exactly how this would be accomplished.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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124	6.b	365		Underground drill and blast cycles will need more information to determine impacts. Specifically air emissions generated from explosives and rock material. Ventilation to surface will also need more characterization for evaluation of impacts due to blasting.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
125	6.b	366		What are the face dimensions?  Requested Action: Answer question.	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.	Resolved.  Requested Action: None.	The language in the amended EAW describing the face dimensions is as follows:  EAW December 2024 "Drift-and-fill development would be driven in a square profile (drift) up to 22 ft (6.7 m) wide and from 13-18 ft (4.0-5.5 m) high, using temporary support (friction bolts and screen). [R2_Cmt_#125] [R2_Cmt_#876]"
126	6.b	370		Will ANFO impact contribute to increased nitrate levels in groundwater and how would this be monitored and remediated?  Requested Action: Answer question.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
127	6.b	376		What is the estimate of fan power and airflow?  Requested Action: Answer question.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
128	6.b	378		Could there be mercury released from exhaust air? Will this be monitored and measured?  Requested Action: Answer question. Future discussion item where the response can be considered 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
129	6.b	397		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?	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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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				Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.			
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>	<p>Thank you for your comments regarding the classification and management of waste rock within the project. Talon has simplified the waste classification scheme in the amended design to differentiate only between waste rock and non-waste rock (ore). Waste rock, including material outside the ore body, is incorporated into a comprehensive material characterization program to evaluate its geochemical properties, with a focus on identifying any reactivity.</p> <p>In line with Minnesota Rule 6132.1000, the results of this characterization will inform the management of waste rock to ensure compliance with environmental standards. Furthermore, Minnesota Rule 6132.2200 outlines requirements for the storage and handling of reactive mine waste. Although no stockpiles of waste rock are planned for surface storage, the findings from the material characterization program will support the development of a cemented rock fill (CRF) plan, which will manage any potentially reactive material safely within the mine structure.</p> <p>The Environmental Impact Statement (EIS) data submittal will outline the strategies for managing waste rock, while the permit to mine application will provide the detailed waste rock management plan. This approach ensures that both environmental impacts and compliance with state regulations are addressed comprehensively, in alignment with Minnesota's requirements.</p> <p>The following language is in the EAW:</p> <p>EAW December 2024  "A geochemical materials characterization program is in progress that includes a comprehensive suite of static, kinetic, and mineralogical analyses on the geologic materials that will be moved during mining. [R2_Cmt_#136] [R2_Cmt_#913]  These materials include overburden, rock produced as part of mine operations, including lithologies extracted as targeted ore, dilution within ore, and waste rock as well as CRF. [R2_Cmt_#141] [R2_Cmt_#142] [R2_Cmt_#143]</p>

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							[R2_Cmt_#144] The geochemical data from this program would be used to support materials management."
131	6.b	397	Graphic 3, 4	In its initial description of the underground development, a typical underground site layout is described and then points the reader to "Graphic 3" instead of the correct Graphic 4: Three-Dimensional Sketch of Underground Mine Workings.  Requested Action: Consider comment; modify text to address the issue if needed.	Image caption has been revised to refer to Graphic 4 instead of Graphic 3	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Please see the response to comment number 130.</p>
133	6.b	408		<p>RGU notes the EIS will likely require additional elemental analyses and/or ABA testing to establish the classifications.</p> <p>Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.</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.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
134	6.b	412		<p>What pumping rates are expected?</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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135	6.b	425		<p>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?</p> <p>Requested Action: Answer question.</p>	<p>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.</p> <p>While exploration drilling has encountered mineralization, to date there has been no resource delineated in the Tamarack Intrusive Complex outside of the Project Boundary.</p>	<p>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.</p> <p>Requested Action: Modify text to address comment.</p>	<p>The amended EAW has been edited to include the following:</p> <p>EAW December 2024 "In addition to these existing conditions, local activities related to the exploration and definition of the Tamarack Resource Area (SMSU, MSU, CGO East, CGO West, and 138 Zone) and associated baseline environmental data collection include waste and material storage and handling [R2_Cmt_#135]."</p>
136	6.b	425		<p>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?</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>The amended EAW text has been edited to read:</p> <p>EAW December 2024 "A geochemical materials characterization program is in progress that includes a comprehensive suite of static, kinetic, and mineralogical analyses on the geologic materials that will be moved during mining. [R2_Cmt_#136] [R2_Cmt_#913] "</p>
137	6.b	425		<p>Will the non-ore rock have a compounding or a synergetic effect on pollution?</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
138	6.b	425	Graphic 4, 10	<p>Graphic 10: Simplified Illustration of Underground Mining Method does not correspond well with Graphic 4: Three-Dimensional Sketch of Underground Mine Workings. For example, Graphic 10 is missing the portal of the mine shaft.</p> <p>Requested Action: Consider comment; modify document as needed.</p>	<p>Graphic 10 is a simple illustration and is not intended to be an exhaustive depiction of underground mining methods and supporting infrastructure.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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139	6.b	425	Graphic 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>	<p>Thank you for the question; however, the updated project design has fully enclosed all rock handling areas, eliminating direct exposure of waste rock and ore to atmospheric air and precipitation, making this inquiry no longer applicable</p>
140	6.b	444		<p>If information is available: 1) how much cement would be used during the project; 2) where would that cement come from; and 3) what transportation methods would be used to transport cement? This information can be used to inform Item 18's assessment of the greenhouse gas emissions of this activity.</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>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>	<p>Thank you for your comment. We acknowledge that cement production is a significant source of greenhouse gas emissions. Cement usage and its associated emissions will be included in the analysis in Section 18, and we will add cement to the list of materials contributing to the project's GHG footprint. Further quantification of these emissions will be incorporated into the EIS to ensure a comprehensive assessment.</p>
141	6.b	444		<p>RGU notes that the EIS could investigate any potential for CRF usage to result in water quality 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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
143	6.b	444		<p>For the backfill, an engineered Cemented Rock Fill (CRF) will be used. Have there been studies done on their leaching characteristics?</p> <p>Requested Action: Answer question.</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. 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
144	6.b	444		<p>What is the long-term mitigation strategy to ensure little to no reactivity of the CRF with the air and water?</p> <p>Requested Action: Answer question.</p>	<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>	<p>The amended EAW maintains the intent of the original response, but now in context to the amended design. The materials characterization static and kinetic testing of the CRF will inform management strategies that will be presented in the EIS data submission.</p>
145	6.b	444		<p>Has the “crown pillar” strength been analyzed?</p> <p>Requested Action: Answer question.</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
146	6.b	444		<p>How will the “crown pillar” be kept safe during blasting to prevent subsidence?</p> <p>Requested Action: How will the “crown pillar” be kept safe during blasting to prevent subsidence?</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>



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147	6.b	444		<p>What happens if after excavation happens the deflection at the surface becomes not negligible?</p> <p>Requested Action: Answer question.</p>	<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>	<p>Thank you for the question. The project has modeled an expected no deflection at the surface, with subsidence potential estimated at a maximum of 0.2 inches. This aligns with Minnesota Rule 6132.3000, which outlines subsidence requirements that focus on minimizing and managing subsidence impacts. Given this expected stability, additional actions such as ground surveys, contouring, or filling would only be necessary if any observable subsidence posed a genuine concern for public health, safety, or natural resources</p>
148	6.b	445		<p>Has limited backfill mixing underground to minimize "double hauling" been considered?</p> <p>Requested Action: Answer question.</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
149	6.b	445		<p>what are the properties of the CRF compared to (for instance) concrete? Concrete would typically be 10-15% cement vs 4-10% cited for CRF. What would the strength and permeability of this material be expected to be? I'm assuming this will not be high strength (compared to concrete) and will have higher compared to the surrounding bedrock. What would the strength requirements be for this type of backfill?</p> <p>Requested Action: Answer questions.</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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150	6.b	445		<p>The hydraulic characteristics of the cemented rock fill and any other material that is used for backfill should be evaluated because it will affect groundwater hydrology at closure and may impact the leaching of contaminants from the waste rock that is used in the backfill.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
151	6.b	450		<p>If underground drainage becomes acidic, then use of acid-resistant materials may become necessary. Has this been considered?</p> <p>Requested Action: Answer questions.</p>	<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>	<p>Thank you for the comment. At this stage, the project has not planned extensive use of concrete underground. To ensure a comprehensive assessment, a material characterization program is underway and will support the development of the hydrogeochemical model. This data, which will be presented as part of the EIS. If the material characterization indicates potential for acidic underground water chemistry, appropriate mitigation strategies will be evaluated and implemented as needed.</p>
152	6.b	452		<p>If known the EIS should identify the source of externally purchased aggregate, which could allow greater specificity in assessing potential environmental impacts with this project.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
153	6.b	456		<p>It is appropriate to note that no tailings are proposed for use in CRF. At Line 458, add the sentence: "No tailings usage is proposed with the project."</p> <p>Requested Action: Edit text.</p>	<p>Comment is noted.</p> <p>EAW text was edited.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
154	6.b	466		<p>Has any modeling been done to backup pillar depth and estimated subsidence?</p> <p>Requested Action: Answer questions.</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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155	6.b	466		The hydraulic characteristics of the bedrock that comprises the crown pillar should be evaluated in order to determine whether mine dewatering will impact groundwater levels in the unconsolidated sediments above the pillar. A plan to monitor for impacts to the surficial aquifer from mine dewatering should be developed.  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 at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
156	6	466		Does Talon propose to prepare a report analyzing the potential for subsidence and assessing crown pillar stability? Factors that could be considered would be: proposed mining methods; depth of extraction; thickness of deposit; topography; and features of the rock mass located above the deposit.  Requested Action: Answer question.	Refer to lines 468–470.  The Project will address this question, as necessary, in the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
157	6	466		Does Talon propose to report the crown pillar design methodology and provide a summary of all known fractures and joints considered in the design?  Requested Action: Answer question.	Refer to lines 468–470.  The Project will address this question, as necessary, in the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
158	6	466		Does Talon propose to assess the potential for subsidence and crown pillar stability using a three-dimensional numerical simulation to be used over the operating life of the project? Would this include both the empirical Scaled Crown Pillar assessment plus numerical modeling?  Requested Action: Answer question.	Refer to lines 468–470.  The Project will address this question, as necessary, in the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
159	6	466		Does the modeling for subsidence and crown pillar stability need to account for the presence and/or lack of backfill in the mined-out stopes?  Requested Action: Answer question.	Refer to lines 468–470.  The Project will address this question, as necessary, in the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
160	6	466		Does Talon propose to consider the potential for any area above the stopes to be in a fracture of shear zone that could influence the potential for subsidence?  Requested Action: Answer question.	Comment is noted.  Refer to lines 468–470. Additional information, analysis and assumptions regarding the crown pillar modeling will be provided for the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
161	6.b	468		The EAW indicates that the crown pillar is 200 feet of bedrock plus 100 feet of overburden. Should it be assumed that the overburden does not have structural value and therefore the crown pillar thickness that applies to the project is 200 feet?  Requested Action: Answer question.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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162	6.b	468		The EAW states numerical and empirical analyses have shown less than 0.2 inches of subsidence over the mine. Provide these analyses and any supporting data so they can be reviewed.  Requested Action: Provide documentation to confirm the assertion.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
163	6.b	469		No margin of error is provided for the crown pillar depth at the ground surface. Is the depth consistent throughout all locations and depths? In very low gradient wetlands such as peatlands, even small changes in elevation due to subsidence can impact microtopography and water chemistry and therefore plant communities. More detail is needed on this analysis.  Requested Action: Provide documentation to confirm the assertion.	Details regarding the methodologies and assumptions made for the crown pillar stability assessment will be provided in the EIS submission.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
164	6.b	471		If known, what is the volume of development rock that is expected to be generated?  Requested Action: Answer question.	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.	(II) Talon Response
165	6.b	471		As 90% of the backfill is expected to be CRF, an understanding of how this will change groundwater flow long-term will be needed.  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 at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
166	6.b	473		The EIS will likely require additional information on the areas to be filled with uncemented rock. If known would using cemented backfill everywhere reduce the chances of subsidence even more?  Requested Action: Answer question. Future discussion item where the response can be considered in development of the Draft Scoping Decision Document.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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167	6.b	477		<p>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?</p> <p>Requested Action: Answer question.</p>	<p>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.</p> <p>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.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
168	6.b	477		<p>How will the portals be designed so that one would serve as a fresh-air intake and the other as exhaust?</p> <p>Requested Action: Answer question.</p>	<p>See Response to Comment #167.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Thank you for your question regarding ventilation design. In the revised mine design, the dual decline layout, which originally featured two portals for intake and exhaust, has been modified. The Portal would now function as the primary fresh air intake for the mine's operations. Due to air velocity limitations, the Portal alone would only supply approximately 50% of the required ventilation air. To meet the full airflow requirements, additional air would be supplied through Surface Raise 2 during construction and Surface Raise 1 during operation. Once Surface Raise 1 is operational, all return air would be exhausted via a dedicated raise bore shaft. Details of this revised design have been provided in the amended EAW data submittal.</p>
169	6.b	477		<p>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?</p> <p>Requested Action: Answer question.</p>	<p>See Response to Comment #111.</p>	<p>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.</p>	<p>Please see the response to comment number 111.</p>

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						Requested Action: None.	
170	6.b	477		<p>Are there any potential impacts from the fact that there will be no frost around the portals in winter?</p> <p>Requested Action: Answer question.</p>	The Project requests additional explanation and context regarding this question.	<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Thank you for the inquiry. The project's design aligns with established practices for cold-weather mining operations, and thermal gradients are commonly managed within this framework. No additional impacts are anticipated due to minor temperature variations near the portal.
171	6.b	478		<p>Would booster fans and air doors be required?</p> <p>Requested Action: Answer question.</p>	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.	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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172	6.b	491		<p>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?</p> <p>Requested Action: Answer question.</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>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
173	6.b	491		<p>The backfill plant creating the CRF is essentially a cement plant. The Draft Scoping Decision Document will detail how potential impacts would be evaluated.</p> <p>Requested Action: Advisory only.</p>	<p>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.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
174	6.b	498		<p>RGU notes that overburden contains organic material as well as mercury. If known are there plans to line the overburden stockpile, including collection of leachate to be treated as contact water, to avoid increases in methylmercury in surrounding surface waters? The EIS would likely require a detailed description of the water quality of leachate from the overburden stockpile. Also, would peat that is excavated from the rail corridor be stored here?</p> <p>Requested Action: Answer question. Response will inform development of Draft Scoping Decision Document, especially in considering potential for mercury or other impacts from stockpiling of these materials.</p>	<p>The Materials Characterization Program is underway and designed to collect a range of data needed to understand the geochemical constituents of overburden materials.</p> <p>The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Please see the response to comment number 76.</p>
175	6.b	498		<p>If known detail should be added that describes how the overburden and topsoil would be screened (prior to placement in outdoor stockpile) as being appropriate for the listed potential uses identified in Lines 499-501.</p> <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>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.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Please see the response to comment number 76.</p>

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176	6.b	498		EAW should describe how the overburden and topsoil stockpile footprint would be graded and lined to collect and treat leachate.  Requested Action: Consider comment and edit text where anything is known at this time.	Comment is noted.  The Project will address, as necessary, this issue in the EIS.	Resolved.  Requested Action: None.	Please see the response to comment number 76.
177	6.b	498		What is the anticipated height of the overburden pile?  Requested Action: Answer question.	The Overburden Stockpile (temporary) is currently planned to be 40 feet in height.	Resolved.  Requested Action: None.	Please see the response to comment number 76.
178	6.b	501		The text implies that overburden would be stored long enough to be used in reclamation. Long term soil stabilizations methods would be needed to limit erosion in addition to BMPs for dust generation. Clarification as to whether the proposed overburden storage site is intended for short-term as well as long-term storage.  Requested Action: Consider comment; add detail if available. If not available, then the issue flagged for the Draft Scoping Decision Document.	Comment is noted.  Future discussion item, as necessary, in development of DSDD.	Resolved.  Requested Action: None.	Please see the response to comment number 76.
179	6.b	501		RGU notes that if the overburden contains mercury, consideration of the adequacy of dust control BMP's would likely be needed for the EIS. The analysis may determine the possibility that additional dust controls are needed beyond standard BMP's.  Requested Action: Advisory only. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.	Comment is noted.  The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping.  Requested Action: None.	Please see the response to comment number 76.
180	6.b	501		The EIS would likely require further explanation around what would constitute "best management" practices for dust control.  Requested Action: Consider comment; add detail if available. If not available, then the issue flagged for the Draft Scoping Decision Document.	Comment is noted.  Future discussion item, as necessary, in development of DSDD.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
181	6.b	503		It known how would the peat and muck deposit be removed or stabilized to prevent settlement from causing distress to the liner and leachate collection system placed for the Cement Rock Fill (CRF) manufacturing area footprint?  Requested Action: Answer question. Modify text as needed.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.



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182	6.b	503		<p>The EIS would likely require a detailed project description, which among other project components address the design of the outside area to be used to manufacture the CRF material. Issues to be considered in the design include, but are not limited to, the following: 1) how the CRF would be separated from the surface environment, 2) how infiltration of water into the CRF and into the liner system would be restricted, 3) how temperature extremes would be addressed including freeze-thaw, 4) how cyclic wetting and drying of the liner system would be addressed, 5) how penetration of roots or burrowing animals through the liner system would be addressed, 6) how total and differential settlement of foundation soils would be addressed, 7) how long term moisture changes of the natural soil or liner system would be addressed, and 8) how the hydraulic barrier liner system and pad would be selected.</p> <p>Requested Action: Advisory only. Information recommended for consideration in selecting design for CRF. Future discussion item for 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>	<p>Thank you for your detailed comment. The current project design no longer includes an external facility or associated storage area for manufacturing CRF material. The process has been fully integrated into the main building, with only commercially sourced aggregate outside.</p>
183	6.b	503		<p>Would sulfur be the only proxy used for classification? Preliminary characterization has found that metals, and other parameters, are not well correlated as a function of sulfur within the various waste rock units.</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
184	6.b	504		<p>The document correctly notes that metal leaching criteria must be established for the project to determine materials that are suitable for construction and materials that must be specially managed for metal leaching. Continue to work with DNR to develop appropriate metal leaching criteria suitable for protecting the environment and meeting regulatory expectations. This would likely include metal leaching and acid mine drainage management objectives and conceptual design that must be developed to help plan for waste management mitigation at the level determined appropriate for the EIS.</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>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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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185	6.b	504		<p>RGU notes that sulfur concentration may not be sufficient to classify different waste rock categories. A comprehensive waste characterization program needs to be completed to accurately define the level of material management required.</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>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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
186	6.b	504		<p>Note, the mine waste material classification and management strategies for EIS requirements may not be detailed enough or sufficient for a permit to mine application.</p> <p>Requested Action: Advisory only.</p>	<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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
187	6.b	507		<p>More data and discussion relative to analyses and classification method and ranges could be required. Are there enough drill core left for this or will another drilling program be needed?</p> <p>Requested Action: Answer question. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.</p>	<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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
188	6.b	507		<p>How are the different rock categories (2 and 3 specifically) determined during mine operation?</p> <p>Requested Action: Answer question. Modify text as needed.</p>	<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>	Please see the response to comment number 130.
189	6.b	512		<p>How will the class 1,2,3 development rock be analyzed and segregated? When will the sampling size, frequency, plan and QAQC plan be developed for this?</p>	<p>See Response to Comment #188.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	Please see the response to comment number 130.

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				Requested Action: Answer question. Modify text as needed.			
190	6.b	514		Will there be a testing regime to determine sulfur content during development?  Requested Action: Answer question.	See Response to Comment #188.	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.  Requested Action: None.	Please see the response to comment number 130.
191	6.b	514		The overburden/bedrock mixed material will need to be classified based on waste characterization testing of the two materials. Perhaps it would fall into the undefined Class 2 type, but waste characterization test work will need to be used for determining the correct class type.  Requested Action: Advisory only. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.	Comment is noted.  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.  Future discussion item, as necessary, in development of DSDD.	Resolved.  Requested Action: None.	The project would likely encounter minor quantities of mixed overburden and bedrock material as excavation approaches the bottom of the overburden. This material, similar to the overburden, would be promptly removed from the site upon excavation and transported to a nearby landfill facility for appropriate disposal.

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192	6.b	515		<p>It is not explained why the mixed material of overburden and bedrock would be handled as Class 2 bedrock. Provide a rationale for this and if there are any implications for storing the two together considering any differences in geochemical characterization, etc.</p> <p>Requested Action: Answer question.</p>	<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>	<p>Please see the response to comment number 191.</p>
193	6.b	518		<p>If known, exactly how much sulfur is found in each of the rock categories?</p> <p>Requested Action: Answer question.</p>	<p>See Response to Comment #132.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
194	6.b	520		<p>What is the purpose of blending the high and low-sulfur rock? A different approach would be to treat the high-sulfur rock separately than low-sulfur rock with extra precautions taken, not blended as proposed.</p> <p>Requested Action: Answer question. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.</p>	<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>	<p>Please see the response to comment number 130.</p>

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195	6.b	522		To the degree known the document should describe the method of blending Class 1 and 3 development rock, where and when the blending process is to take place (surface or underground) and a testing program to ensure the blended Class 2 rock maintains homogeneity.  Requested Action: Consider comment and edit document if possible. Future discussion item for development of Draft Scoping Decision Document.	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	Thank you for your question. The amended project design has eliminated classes of waste rock and the blending, making this specific inquiry no longer applicable.
196	6.b	523		Will monitoring be conducted to measure any release of sulfur to groundwater or surface water from the lined storage area?  Requested Action: Answer question.	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.	Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.
197	6.b	524		This talks about a water collection system for runoff - what about groundwater/seepage? Is a subsurface system needed to collect seepage through the liner or control groundwater?  Requested Action: Answer question.	Comment noted.  See Response to Comment #196.	Resolved.  Requested Action: None.	Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry about subsurface systems for seepage or groundwater control no longer applicable.
198	6.b	526		Commercial aggregate would be used to make CRF after development rock is depleted. If the potential source(s) is know, 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
199	6.b	526		The RGU notes that it remains to be determined how the acquisition, transport, and use of commercial aggregate would be evaluated in the EIS.  Requested Action: Advisory only. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.	Comment is noted.  Future discussion item, as necessary, in development of DSDD.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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200	6.b	530		<p>Note, ensuring no net acid production from any of the mine wastes stored underground will be a project requirement. In addition, release of metals or other potentially harmful constituents under neutral to alkaline conditions will also need to be evaluated to ensure protection of natural resources.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
201	6.b	536		<p>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?</p> <p>Requested Action: Answer question. Response will inform development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>The exact type of alkaline material has not yet been determined but could include lime, limestone, cement or other materials.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
202	6.b	536		<p>What are the alkaline material's longevity and effectiveness? Have they been analyzed?</p> <p>Requested Action: Answer question. Response will inform development of Draft Scoping Decision Document.</p>	<p>Comment noted.</p> <p>See Response to Comment #201.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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203	6.b	536		<p>How exactly will these fines be analyzed? Provide specific methods.</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Talon has reviewed this comment in light of the amended design, and the fines are to be transported to the concentrator. The EAW draft has been updated as follows:</p> <p>EAW December 2024 "Fines would be transported from the underground settling sumps to the rail loading buffer area for transportation to the concentrator. [R2_Cmt_#203] [R2_Cmt_#893] [R2_Cmt_#927] [R2_Cmt_#936]"</p>
204	6.b	537		<p>How would the alkaline material be incorporated and tested to determine it won't be acidic?</p> <p>Requested Action: Answer question.</p>	<p>Comment noted.</p> <p>See Response to Comment #201.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
205	6.b	538		<p>Although the fines might only account for 2% of the backfill, this material could still have a potential for significant impact on water quality. Future waste characterization of this material should be considered and discussed.</p> <p>Requested Action: Advisory only. Future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>The Materials Characterization Program includes the 'fines' material. Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Please see the response to comment number 203.</p>
206	6.b	541		<p>The document indicates project-related activities would result in combinations of various materials that may or may not be used as backfill components. Analysis of all these combinations of materials, whether used as backfill or not used as backfill, would be needed along with their planned disposal methods and locations for the EIS.</p> <p>Requested Action: Advisory only. Future discussion issue for development of Draft Scoping Decision Document, where the EIS will require detailed information to assess potential impacts.</p>	<p>Comment noted.</p> <p>See Response to Comment #191.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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207	6.b	541		<p>Information regarding the character and management of water treatment residue is required. This may be important given the preference of using reverse-osmosis or other membrane based water treatment technologies, which generate a liquid brine waste. If known, the document should discuss the volume, character, and management of this stream in some measure of greater detail.</p> <p>Requested Action: Advisory only. Future discussion issue for development of Draft Scoping Decision Document, where the EIS will require detailed information to assess potential impacts.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
208	6.b	541		<p>All material movement within the project will need to be evaluated for various types impacts.</p> <p>Requested Action: Advisory only. Future discussion issue for development of Draft Scoping Decision Document, where the EIS will require detailed information to assess potential impacts, especially for air and water resources.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
209	6.b	543		<p>Information regarding how the lined stockpile pad at the backfill materials storage area will be constructed (e.g., will it have a geomembrane liner, will it use gravity drains or pumps) should be provided, including hydraulic conductivity estimates for all liner materials.</p> <p>Requested Action: Respond to request with information as now known. Project description for EIS will require detailed information around all proposed liners. Future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Specific details regarding the construction of the liner system at the Backfill Materials Stockpile will be provided as part of the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>	<p>Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.</p>
210	6.b	544		<p>If known the document should identify what liner type is proposed. Based on the selection, the EIS may include further identification and assessment of the risk for short term or long term failure for the following liners: single compacted bentonite amended soil liner (BAL), single compacted clay liner (CCL), single geomembrane (GM), single geosynthetic clay liner (GCL), two component composite line GM/CCL, two component composite liner GM/GCL. Consideration is likely around the polymer choice and why it was been selected for the GM.</p> <p>Requested Action: Respond to request with information as now known. Project description for EIS will require detailed information around all proposed liners, including potential alternatives to the proposed action. Future discussion issue for development of Draft Scoping Decision Document.</p>	<p>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.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>	<p>Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.</p>



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211	6.b	545		<p>It is likely that dust originating in the backfill materials storage area would be reactive (to some degree). The EIS may consider the efficacy of dust control BMP's to ensure that they are sufficient to prevent contamination from blowing dust.</p> <p>Requested Action: Advisory only. Future discussion issue for development of Draft Scoping Decision Document, where there may be consideration of potential alternatives that reduce handling/dust generation within the backfill storage facility.</p>	<p>Comment is noted.</p> <p>A Fugitive Dust Control Plan will be developed to control fugitive emissions.</p> <p>Future discussion item, as necessary, in development of the DSDD.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.</p>
212	6.b	547		<p>A Fugitive Dust Control Plan is forthcoming in EIS. Recommend review of NIOSH Dust Control Handbook for Industrial Minerals Mining and Processing (NIOSH, 2019) in preparation of the Fugitive Dust Control Plan. Plan for sampling and analysis of types and quantity of fugitive dust has not been presented.</p> <p>Requested Action: Advisory only. Future discussion issue for development of Draft Scoping Decision Document, where the may be consideration of the required sampling and analysis protocols for the types and quantity of fugitive dust generated during operations; this would be needed to assess the predicted efficacy of the measures.</p>	<p>Comment noted.</p> <p>See Response to Comment #211.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
213	6.b	550		<p>If known, describe the plan to control fugitive dust while backfill materials are stored for 4-5 years temporarily.</p> <p>Requested Action: Consider comment and edit text as currently understood. This would be detail required for the detailed project description for the EIS.</p>	<p>Comment noted.</p> <p>See Response to Comment #211.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.</p>
214	6.b	561		<p>If known, describe dust control system that would be included within the crushing facility and how worker respiratory health will be protected in accordance with MSHA.</p> <p>Requested Action: Consider comment and edit as currently understood. The response will inform the EIS's consideration of potential worker respiratory health issues, especially protection in accordance with MSHA requirements. Future discussion item.</p>	<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 &amp; 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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215	6.b	563		<p>If known, how much cement is anticipated for the CRF? The trucking of cement should be considered with the traffic plan.</p> <p>Requested Action: Answer question and modify text as known.</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
216	6.b	566	Figure 11	<p>Graphic 11 only describes material flows at the mine site. The document would benefit from a similar, additional graphic/table/etc. describing materials flow of supplies to the mine (cement, grout, aggregate, etc..) and from the mine (ore, RO waste solids, garbage, etc..).</p> <p>Requested Action: Consider comment and edit document to address.</p>	<p>The Project intends to develop this as part of the EIS process when the various types of external &amp; 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
217	6.b	566	Graphic 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>	<p>Please see the response to comment number 130.</p>
218	6.b	566	Graphic 11	<p>The language found in Graphic 11: Flowchart of Material Transfer between Surface and Underground does not match the language used in the EAW text. Most prominent of these is the use of "Type" instead of "Class" when describing the three categories of development rock.</p> <p>Requested Action: Consider comment; modify text as needed for body and graphic.</p>	<p>Comment is noted.</p> <p>The graphic text was updated.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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219	6.b	569		<p>The potential for railcars to be contaminated with dust from the loading of ore with a front end loader is a consideration. This could lead to dust sticking to the railcars that would subsequently leave the site that could be deposited along the rail line between the mine and the Minnesota border (or even the rail line to the processing facility in North Dakota). In this respect, consideration could also be given to treating the railway yard as a contact water area.</p> <p>Requested Action: Advisory only. Future discussion item in development of the Draft Scoping Decision Document, which could include consideration of washing the rail cars before they leave the rail loadout facility. More broadly, the project description will require detail on this project component to assess potential impacts.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
220	6.b	569		<p>The proposer should anticipate the EIS identifying the need for a comprehensive monitoring program for the rail line and the rail switches north of the BNSF rail line determine if reactive dust/material spills are occurring.</p> <p>Requested Action: Advisory only. Such a monitoring program would be used to minimize potential impacts to wetlands or water resources.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and the Project now utilizes unit trains instead of manifest trains, which would reduce the frequency of shipments. Details on this updated approach are provided in the amended EAW as follows:</p> <p>EAW December 2024          "An outgoing shipment of approximately 120 railcars would be collected by the BNSF approximately every 4 days. The Ore would be transported by railway from the Project Area to a stand-alone processing facility with a concentrator located off-site in Mercer County, North Dakota. [R1_Cmt_#11] [R2_Cmt_#221] [R2_Cmt_#21] [R2_CMT_#16] [R2_CMT_#17] [R2_CMT_#18]"</p>

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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>	<p>Please see the response to comment number 221.</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>	<p>Talon has reviewed this comment in light of the amended design and the following sentences in the draft EAW have been updated as follows:</p> <p>"With the current expected optimal payload capacity of 115.7 tons (105 tonnes) per railcar, each 120-car unit train would haul approximately 13,900 tons (12,600 tonnes). At the projected mine rate, BNSF would need to exchange train sets every 4.1 days on average. If a unit train was released every 4.1 days (about 90 trains per year), the annual shipments would total approximately 1.2M tons (1.1M tonnes). [R2_Cmt_#43] [R2_Cmt_#221] [R2_Cmt_#223] [R2_Cmt_#791]"</p>
224	6.b	570		<p>If known: 1) what is the capacity of the ore storage and rail loadout facility(?); 2) should there be any delays in transportation of material to North Dakota, how many days can the ore/Class 3 rock be stored in the facility before running out of space(?); and 3) are there other areas of the mine contemplated for contingency storage?</p> <p>Requested Action: Answer questions.</p>	<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>Talon has reviewed this comment in light of the amended design and the following sentences in the draft EAW have been updated as follows:</p> <p>"The building would be sized to include a buffer area of approximately 4,400 tons (4,000 tonnes) of ore and 4,400 tons (4,000 tonnes) of waste rock that would be used for backfill. [R2_Cmt_#224] [R2_Cmt_#931]"</p> <p>"To accommodate some variations in BNSF's rail cycle, a buffer area with 4,400 tons (4,000 tonnes) of capacity would be available within the Ore Transfer Building to prevent interruptions in material flows. [R2_Cmt_#224]"</p>

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						Requested Action: Modify text to address comment.	
225	6.b	571		Some type of verification would likely be required to verify "enclosed building" is achieved prior to making any assumptions related to air quality assessments.  Requested Action: Advisory only. Future discussion item, potentially component of work plan development.	Comment is noted.  When applicable, buildings are being designed to meet EPA method 204 total enclosure.  Future discussion item, as necessary, in development of DSDD.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
226	6.b	577		If known, what kinds of railcars are being used? Can fine sulfide minerals escape out the bottom along the railroad tracks?  Requested Action: Answer question; response will be used in development of Draft Scoping Decision Document.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
227	6.b	577		The detailed project description should allow understanding of all sources of fugitive dust, including from ore/development rock handling among other cited sources.  Requested Action: Advisory only. Future discussion item for development of Draft Scoping Decision Document, especially related to assessment of potential dust-related contributions to contact water and industrial stormwater. This would be in addition to assessing fugitive dust impacts to water quality and associated mitigations generally.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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228	6.b	578		<p>The EIS may require more information around any contingency plans in place for holes, leaks, or malfunctions with covers for railcar transport. Supplying case studies or reference sites describing fugitive dust control measures associated with movement of material with MLARD potential may be needed.</p> <p>Requested Action: Advisory only. Future discussion topic 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>Follow up – The Proposer is encouraged to provide discussion in the DSDD.</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>
229	6.b	585		<p>The detailed project description may require more specificity around ore movement schedules and railcar loading and unloading.</p> <p>Requested Action: Advisory only. Future discussion topic 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
230	6.b	586		<p>If known, any measures associated with temporary slow periods or shutdowns should be provided, especially for when the ore/Class 3 rock would sit in the loadout facility for an extended period of time. It is not uncommon for mines to enter into periods of care and maintenance and so the appropriate planning for such periods should begin as early as possible. How materials ready to be shipped would be managed during a temporary closure period would be useful to document.</p> <p>Requested Action: Consider comment and add detail to the document where appropriate. Detail here may be needed for the project description to support the EIS analyses.</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>

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						Scoping Decision Document	
231	6.b	587		<p>Source terms for water quality modelling must be developed for all potential waste stored for short and longer periods. Contingency planning and source term development are critical even if waste may be moved off site.</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>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
232	6.b	589		<p>More detail is needed about construction of the railway spur.</p> <p>Requested Action: Advisory only. This would be accomplished in the detailed project description. Detail needed to assess potential impacts to wetlands and surrounding areas.</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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
233	6.b	596		<p>Detailed water balance is needed and a range of different alternatives for water management need to be developed.</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 for the purpose of scoping.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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234	6.b	596		<p>A detailed water balance model should be constructed for the mine to estimate the quantities of water that will be generated for each category of water, and where and in what quantities water will be moved, stored, used, and discharged at the site.</p> <p>Requested Action: Advisory only. Future 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 for the purpose of scoping.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
235	6.b	598		<p>If known provide an estimate of the volume of contact water that will be generated.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
236	6.b	606		<p>How will the contact water from the underground mine be processed ?</p> <p>Requested Action: Answer question.</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
237	6.b	615		<p>Explain how the TBM water is to be permitted. Will it be considered construction dewatering (permitted under the construction stormwater permit) or industrial wastewater (under the industrial wastewater permit)? It is unclear at this time whether the TBM water can be covered under a construction stormwater permit.</p> <p>Requested Action: Answer question.</p>	<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>	<p>The amended EAW maintains the intent of the original response, but now in context to the amended design.</p>



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238	6.b	621		<p>For the non-potable water "used for other purposes," information on reuse locations and water quality will be needed.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
239	6.b	628	Figure 3; Graphic 12	<p>The graphic shows there will be an industrial stormwater pond/treatment system, yet Figure 3 does not indicate where on site this system will be located. Revise Figure 3 to show this.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
240	6.b	629	Graphic 12	<p>More information on the anticipated wastewater quality, quantity, flow rates, and wastewater treatment processes and design will be required for the EIS and permitting</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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241	6.b	630		<p>The EAW needs to contain what action Talon will take in order to address community's concerns about potential environmental impacts.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
242	6.b	630		<p>Specifically describe the "advanced, affective, and sustainable technology" Talon will be utilizing for the proposed project.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
243	6.b	630		<p>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?</p> <p>Requested Action: Answer question.</p>	<p>The Contact Water Collection Sumps and pumping system are designed to handle the inflows generated by the 200-year storm event frequency criteria.</p> <p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Thank you for your question. The amended project design has eliminated the lined backfill materials storage area, so the scenario of overflow routing and management through lined ditches is no longer applicable.</p>
244	6.b	630		<p>Different sources of contact water described. What is a conservative estimate of contact water volume? This would help with assessment of storage and treatment capacity needs.</p>	<p>Commented noted.</p> <p>See Response to Comment #235</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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				Requested Action: Address comment and update EAW as appropriate.			
245	6.b	630		<p>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?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Thank you for your question. The amended project design has eliminated the above-ground storage tank facility, making this inquiry about tank and secondary containment area capacities no longer applicable</p>

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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>	<p>Thank you for your question. The amended project design has eliminated the above-ground storage tank facility, making this inquiry about tank and secondary containment area capacities no longer applicable</p>

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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>	<p>Thank you for your comment. Future discussion item, as necessary, in development of 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>	<p>Thank you for your comment. Future discussion item, as necessary, in development of 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>	<p>Thank you for your question. The amended project design has eliminated the need for lined ditches and water sumps, making inquiries related to their integrity, capacity for larger-than-expected inflows, and overflow management no longer applicable.</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>	<p>Thank you for your question. The amended project design has eliminated the need for lined ditches and sumps, making the request for construction details and hydraulic conductivity estimates for liner materials no longer applicable.</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>	<p>Thank you for your comment. With the elimination of surface sources that could generate contact water from precipitation, there is no longer a need to manage extreme storm events in the backfill storage area. As a result, the use of the backfill storage area, which has been eliminated, for overflow water management has become unnecessary and is no longer applicable to the project design.</p>

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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>	<p>Thank you for your comment. The amended design has rendered the previous considerations related to using backfill storage for stormwater management obsolete. The amended design has eliminated surface sources that would generate contact water from precipitation, thus removing the need for external containment measures, such as storage tanks, ponds, or secondary containment areas, for managing excess water during extreme storm events. This makes the comment no longer applicable.</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> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for your comment. With the revised project design, the project should fall under industrial stormwater regulations, which provide detailed guidance for stormwater management, including system sizing. These regulations provide the standards for managing stormwater effectively, eliminating the need for specific definitions or discussions of 'extreme storm events' within this context."</p>
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>	<p>Thank you for your comment. The amended project design has eliminated the combined storage area for backfill materials and overflow water, making this inquiry no longer applicable.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>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</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>



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				Requested Action: Address comment and update EAW as appropriate.		EAW.  Requested Action: None.	
259	6.b	668		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
260	6.b	669		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?  Requested Action: Answer questions.	Enhanced permeability zones are inherent to fractured bedrock. Expected spacing, distribution, hydraulic conductivity and modeling methodologies will be provided for the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
261	6.b	669		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.  Requested Action: Answer questions.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
262	6.b	673		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?  Requested Action: Answer question.	See Response to Comment #260.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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263	6.b	676		How specifically would discrete zones of enhanced permeability be sealed to minimize groundwater inflow and how would potential failures in these attempts be addressed?  Requested Action: Answer question.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
264	6.b	677		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?  Requested Action: Answer question.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
265	6.b	677		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?  Requested Action: Answer questions.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Thank you for your question. With the elimination of the surface sources generating contact water, the need to divert water to storage tanks rather than the water treatment plant has also been removed. The updated project design focuses on controlling water within enclosed systems, ensuring that surface overflow management is no longer a requirement.

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268	6.b	685		<p>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?</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 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.</p> <p>Requested Action: None.</p>	<p>Thank you for your follow-up on Comment 268. We are addressing this point by ensuring that the Environmental Assessment Worksheet (EAW) includes a concise statement regarding discharges. The necessary detailed information for evaluating these discharges will be provided in the Environmental Impact Statement (EIS) data submittal. This approach is intended to ensure a thorough and compliant analysis of potential impacts in alignment with NPDES/SDS permit requirements. We appreciate your guidance in refining this aspect of the project documentation</p> <p>EAW December 2024 "Waters discharged to the environment would undergo evaluation, with additional information to be included in the forthcoming EIS data submittal. [R2_Cmt_#268]"</p>
269	6.b	685		<p>How will Industrial Stormwater impact Tamarack River, Prairie River, and ultimately Big Sandy Lake?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
270	6.b	691		<p>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.</p> <p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
271	6.b	691		<p>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.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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272	6.b	697		<p>How will stormwater be evaluated to ensure it is meeting the appropriate standards? What specific standards will be used?</p> <p>Requested Action: Answer question.</p>	<p>The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.</p>	<p>Follow-up: How will stormwater be evaluated to ensure it is meeting the appropriate standards?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your follow-up question. The EAW draft text has been updated to include the following: "The evaluation of stormwater to ensure it meets appropriate standards, including monitoring and compliance, would be addressed during the future permitting process under the NPDES program. This process would specify monitoring requirements and establish protocols to confirm that water quality aligns with standards set forth in Minnesota Rules, chapter 7050.0220 subpart 3a, and other applicable regulations."</p> <p>NEED TO ADD TO THE EAW</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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277	6.b	707		How will impacts to nearby wetland and/or ditches from construction stormwater discharge be monitored and assessed? What specific standards will be used?  Requested Action: Answer question.	Comment is noted.  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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
278	6.b	714		Same comment as in line 707  Requested Action: See GLIFWC-24.	Comment is noted.  Is the line number referenced (707) the Comment number?	Clarification: The requested action from round one should read: "See comment 275".  Requested Action: Review and make changes if necessary.	Please see the response to comment number 275.
279	6.b	715	Figure 5	On Figure 5, recommend adding a clear label or distinction between the public ditch and the natural stream along the discharge route.  Requested Action: Address comment and update EAW as appropriate.	The discharge route is a public drainage system along its length from the Mine Site to the Tamarack River.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
280	6.b	715		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.  Requested Action: Regulatory guidance. Future discussion item.	Public drainage system and stream capacities studies will be conducted, as necessary for the EIS.	Resolved for the purpose of scoping.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
281	6.b	717		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).  Requested Action: Address comment and update EAW as appropriate.	Public drainage system and stream capacity studies will be conducted, as necessary for the EIS.	Resolved for the purpose of scoping.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
282	6.b	718	Figure 5	On Figure 5, Check whether flow direction arrows on County Ditch 23 are correct.  Requested Action: Address comment and update EAW as appropriate.	Flow direction arrows have been corrected on Figure 5.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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. <a href="https://www.health.state.mn.us/communities/environment/water/docs/ncom/noncom.pdf">https://www.health.state.mn.us/communities/environment/water/docs/ncom/noncom.pdf</a></p> <p>Requested Action: Regulatory guidance. Future discussion item.</p>	<p>Comment is noted.</p>	<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>	<p>Thank you for your comment. Table 9.1 will be modified to include the requirement for obtaining approval from the Minnesota Department of Health for the construction of a public water system, ensuring compliance with state regulations for public water supply systems.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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287	6.b	728		An aquifer pumping test should be completed in wells to obtain estimates of aquifer properties, using additional observation wells where possible.  Requested Action: Future discussion item.	Comment is noted.  The Project will address, as necessary, this issue in the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	The capture zone of a potable well is the three dimensional volume around the well that contributes water to it. The capture zone depends on the pumping rate, hydraulic properties of the aquifer and the duration of pumping. A capture zone will also be created from inflow of groundwater to the mine similar to a pumping well. If, when and where the capture zones from these two sources of perturbations interfere with each other, the drawdown will be a superposition of the drawdown induced from pumping of the potable well and the drawdown induced from mine inflows. The capture zones and superposition of drawdowns if they occur will be evaluated with a three-dimensional groundwater model. However, the geologic and hydrogeologic settings suggest the degree of interference will be negligible because the geologic units between the potable well and mine inflows will disperse the cone of influence induced by mining and the drawdowns induced by mine inflows will dissipated with decreasing depth above the location of mine inflows. The mine plan is protective of the environment against groundwater quality degradation as all ore handling and storage will be performed in a covered building with impermeable floors with all contact water generated in the building captured and routed to the water treatment to protect the quaternary aquifer.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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290	6.b	728		<p>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..</p> <p>Requested Action: Regulatory guidance. Future discussion item.</p>	Comment is noted.	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
291	6.b	731		<p>Provide more detailed information on the sanitary water treatment plant and how and to what standards the water would be treated?</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>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.</p> <p>Requested Action: None.</p>	Thank you for your comment. The amended project design no longer includes an on-site toilet water treatment plant. Instead, toilet water will be managed using a holding tank system, with regular pump-outs and disposal through an approved municipal wastewater treatment facility. Gray water will be sent to the water treatment plant. The EAW text reflects this updated approach to sewage waste management
292	6.b	737		<p>How will potential impacts of treated sanitary water to the local watershed be assessed and remediated if there are impacts?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>The Project will address this question, as necessary, in the EIS and/or permitting.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	Thank you for your question. The amended project design no longer includes the treatment of sewage water on-site, so potential impacts to the local watershed from treated sewage water are not applicable. Instead, sewage waste will be stored in a holding tank and regularly pumped out for treatment at an approved municipal wastewater facility.



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293	6.b	739		<p>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.</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 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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your question. The amended project design no longer involves combining process wastewater and sewage wastewater for discharge. The EAW details separate management strategies for process, toilet waste, and gray water.</p>
294	6.b	743		<p>In consideration of the nearby Fond du Lac Indian Reservation and its Federal Class I air-shed designation, will incremental impacts assessment be done to quantify the impacts from the diesel engine sets from their use while awaiting on the substation development, and for emergency use during the Project operations?</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>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 conducted.</p> <p>Requested Action: None.</p>	<p>The Project recognizes that the nearby Fond du Lac Indian Reservation is currently designated as a Class II area under federal air quality standards. As such, the Project's air quality assessments and permit considerations are based on this existing regulatory status. The Project will continue to comply with all applicable standards under current and future regulations as required.</p> <p>While there is acknowledgment that regulatory frameworks may evolve, including potential future designations of Class I status for nearby areas, the Project has not included this speculative regulatory scenarios in the EAW. Should the RGU deem it necessary to address potential future changes in the EIS, the Project will respond accordingly and adapt as needed to meet new requirements.</p>
295	6.b	743		<p>How will the various pipelines to be used to move various types of water around the mine site impact the surface and near-surface water flow? Will the potential impacts be assessed in a study or other?</p> <p>Requested Action: Answer question.</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>The Project has significantly reduced the number of pipelines, with most now located within the main building or the underground mine, and minimal buried pipelines remaining. Consequently, the Project does not plan to study potential impacts to surface and near-surface water flow caused by pipelines, as these changes ensure minimal to no effect at the project scale.</p>

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296	6.b	743		<p>Will condensate impacts from the outer pipe-walls due to temperature differences between the pipe and the ground be considered?</p> <p>Requested Action: Future discussion item.</p>	The Project requires clarification of the request.	<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted</p>	Thank you for the comment. With the amended project design, most pipelines are now located within the main building or the underground mine. Given these updates, potential impacts from condensation forming on outer pipe walls due to temperature differences between the pipe and the ground are not applicable.
297	6.b	743		<p>How impacts of all project utilities would be assessed will need to be identified for the scoping EAW and Draft Scoping Decision Document.</p> <p>Requested Action: Advisory only. Future discussion item that could include consideration of both specific impacts and potential cumulative impacts.</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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
298	6.b	743		<p>Will an EA or Supplemental EIS be required for the new substation and power distribution system?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	No, the substation and power distribution are part of the Project being proposed.	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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299	6.b	743		<p>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?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	The service into the Electrical Substation will be 69kV.	<p>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.</p> <p>Requested Action: None.</p>	Thank you for your comment. The proposed electrical substation would receive power at 69 kV, and the primary transformers will step down to 13.8 kV.
300	6.b	743		<p>After mine closeout, will the new substation remain in service for the area as a permanent infrastructure, or will it be removed?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	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.	<p>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.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
301	6.b	743		<p>If the peak load may be 33 megawatts, where will the electricity primarily come from?</p> <p>Requested Action: Future discussion item. DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.</p>	Power will be supplied by Lake County power, produced by Great River Energy.	<p>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.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
302	6.b	743		<p>What kind of emissions increases are expected from the power generation plants in order to service the Project?</p> <p>Requested Action: Future discussion item. 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>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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
304	6.b	743		What are the expected emissions from the diesel engines used temporarily until the installation of the new electrical substation?  Requested Action: Address comment and update EAW as appropriate.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
305	6.b	743		During the Project operations, how will these diesel generators be protected for emergency backup power generation for critical systems in case of significant emergency such as a wildfires or extreme flooding?  Requested Action: Answer question.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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.	Please see the response to comment number 1001.
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.  Requested Action: Modify text to address comment.	With the new design, contact water pipelines will be in the mine, or in the surface buildings. Any leaks would be noted and repaired during regular inspections and the water from these leaks would be captured in sumps for treatment.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
313	6.b	794		Are there other potential beneficial uses of the mine at closure rather than backfilling that could be maximized with front-end design to reduce to reduce potential climate and environmental impacts?  Requested Action: Future discussion item. Alternatives analysis.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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						Requested Action: None.	
314	6.b	794		<p>The EAW states, "The mine access declines and mine development areas excavated outside the orebody would not be backfilled." Please provide additional information. Will Full Closure and Post-Closure Plans and Monitoring Plans be considered in the environmental impact statement (EIS) in terms of both environmental impacts and financial assurance requirements?</p> <p>Requested Action: Provide more information regarding the proposed abandonment of declines. Treatment of closure and post-closure plans in the EIS will be evaluated during development of the Scoping EAW.</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Reference lines 801-808 in the initial Project Description.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Thank you for the comment. For clarification the following sentence was added to the EAW:</p> <p>EXW XX 2024 "Details on reclamation and closure will be further discussed in the EIS data submittal. [R2_Cmt_#314]"</p>

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315	6.b	794		<p>This section says that the “[w]after from the underground mine would be managed to meet regulatory requirements.” How will this be managed, according to which regulatory requirements?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>See Response to Comment #324.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
316	6.b	794		<p>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.</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>Follow-up. This information will be provided at a later date (in development of DSDD).</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>
317	6.b	798		<p>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?</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.</p> <p>Requested Action: None.</p>	<p>Thank you for your question. The amended project design no longer includes the surface storage of overburden or waste rock.</p>
318	6.b	800		<p>Any wells constructed on site will require proper sealing once they are no longer in use.</p> <p>Requested Action: Regulatory guidance.</p>	<p>The Project will comply with Minnesota Rules Chapters 4725 and 4727 and Minnesota Statutes Chapter 103I regarding well abandonment.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
319	6.b	800		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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				Requested Action: Regulatory guidance. Future discussion item.			
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.	Thank you for your comment regarding the closure plan. The text of the Environmental Assessment Worksheet (EAW) has been updated to include language clarifying that the closure plan aims to achieve a stable, self-sustaining condition post-closure, without the need for perpetual maintenance.  EAW December 2024 "The closure plan would be developed to ensure that, once implemented, the site would achieve a stable and self-sustaining condition without the need for ongoing, long-term maintenance. [R2_Cmt_#320]"
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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 there isn't a collapse or seepage begin discharged from the access portals?  Requested Action: Address comment and update EAW as appropriate.	Comment is noted.  See Response to Comment #314.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.



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324	6.b	806		<p>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.</p> <p>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.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
325	6.c	819		<p>Visual impact analysis for a 78 foot structure is needed</p> <p>Requested Action: Future discussion item in development of the Draft Scoping Decision Document.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
326	6.b	823		<p>The Objective Statement here is written as Problem Statements and Goals, and not as Objective Statement. This section needs to be reworded so that if Problem Statements and Goals are to be stated, they must be clearly stated in their own sections, and then have the Objective Statement focus on the Objectives that result from those Goals that addresses the Problem Statement.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
327	6.d	823		<p>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?</p> <p>Requested Action: Future discussion item.</p>	<p>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.</p>	<p>Follow-up. This information will be provided at a later date (in development of DSDD).</p> <p>Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>
328	6.d	823		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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329	6.d	834		<p>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</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>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.</p>	<p>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 description), concerns raised, etc. would be helpful in demonstrating meaningful community engagement.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment, Talon maintains an open-door policy for the Project and would invite anyone interested in learning more about the team, project, community engagement, etc. to reach out and schedule a visit. We feel this request is outside the Scoping for an EIS, but are more than willing to discuss the informal community engagement efforts our team has worked on and continues to do.</p>
330	6.d	838		<p>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.</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>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
331	6.b	851		<p>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.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the purpose statement and ensuring an accurate project description.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
335	6.b	851		The Purpose Statement must be framed broadly enough to encompass potential alternatives beyond mere adjustment to the proposed Project. To be useful in the decision-making process, the EIS must be able to evaluate a broad range of alternatives (recycling, sourcing materials from other regions, etc.)  Requested Action: Refinement/modification of Purpose Statement will be considered further by RGU during development of Draft Scoping Decision Document.	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	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
336	6.d	855		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.  Requested Action: Address comment and update EAW as appropriate.	The iron would be present as a byproduct component within the nickel concentrate. There would be no separate iron concentrate product.  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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	Comment is noted.	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	Comment is noted.	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
339	6.e	890		<p>EAW states that "[t]here is ongoing exploration activity in the vicinity of the Project Area..." Does mean other sections of the TIC? Or does this statement refer to the Emily Manganese Project owned by the Nevada Silver Corporation, a subsidiary of North Star Manganese Inc (NSM)?</p> <p>Requested Action: Answer question.</p>	<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>	<p>Thank you for the comment. The suggested change to text was made as follows:</p> <p>EAW October 2023 (as written) "There is ongoing exploration activity conducted in the vicinity of the Project Area; however, given the uncertainty of the information that may be learned through exploration, no future development is currently planned."</p> <p>EAW December 2024 (as modified) "There is ongoing exploration activity conducted by the Proposer in the vicinity of the Project Area; however, given the uncertainty of the information that may be learned through exploration, no future development is currently planned." [R1_Cmt_#339] [R2_Cmt_#341] "</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>	Comment is noted.	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Please see the response to comment number 338.

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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>	<p>Please see the response to comment number 339.</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 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>	<p>Please see the response to comment number 340.</p>
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:  Mine Construction – 2026-2027  Mine Operation (10 years) - 2027-2036  Site Restoration (approx. 5 years) – 2036 – 2040  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>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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345	7.a	901	Graphic 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Please see the response to comment number 343.</p>
347	7.a	910	Graphic 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</p>	<p>Thank you for the follow-up comment. The trend lines currently shown, generated using the Minnesota Climate Explorer tool, serve as a preliminary visual reference for general climate trends and are not intended to imply statistical significance. Talon recognizes the importance of a rigorous statistical approach for the Environmental Impact Statement (EIS) and will ensure that climate trend analyses within the EIS are based on appropriate statistical methods, considering options beyond OLS regression if warranted. Details regarding the chosen analysis method will be provided in the EIS to ensure transparency and accuracy in the interpretation of climate data.</p>

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						analysis will be used in EIS.	

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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>	<p>Thank you for your comment. While the overall trend from 1895 to 2022 is important for understanding long-term variability, including historical droughts, the 1990–2022 period provides valuable insights into more recent climatic trends that directly inform contemporary planning considerations. This recent period was specifically highlighted to reflect changes in precipitation patterns over the past few decades, providing a context that may be more relevant to current conditions. We have retained both analyses in the assessment to offer a balanced view of historical and recent trends. The EAW has been edited to clarify this point as follows:</p> <p>EAW October 2023 (as written) "Graphic 4 summarizes the historical annual precipitation within the region where the Project Area is located. The overall annual historical precipitation trends appear to have increased by approximately 0.24 in/decade from 1895 through 2022. However, the data is skewed by the drought period from 1910 to 1940. If the drought period from 1910-1940 is removed from the dataset, the total annual precipitation trend is approximately 0.11 in/decade from 1940 through 2022. From 1990 through 2022, the data indicate an increasing trend in annual precipitation, estimated at 0.21 inches per decade. [R1_Cmt_#349] [R2_Cmt_#349]"</p> <p>EAW December 2024 (as modified) "Graphic 7.2 summarizes the historical annual precipitation within the region where the Project Area is located. The overall annual precipitation trend from 1895 through 2022 shows an increase of approximately 0.24 inches (6.1 mm) per decade. This period captures both long-term climate variability and historical events, such as the drought from 1910-1940, which heavily influences the overall trend. To provide context for contemporary conditions, recent data from 1990-2022 were reviewed, showing an increased trend of 0.21 inches (5.3 mm) per decade. This recent period reflects more contemporary climatic patterns relevant to current project planning. [R2_Cmt_#349]"</p>



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349	7.a	919	Graphic 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>	<p>Thank you for your close review of this section, especially noting the mismatch between the precipitation trend descriptions in the text and the corrected figures. The text will be revised to reflect the corrected trend data. The EAW has been edited, see response to comment number 348, and as follows:</p> <p>EAW October 2023 (as written) "Even though there is a decreasing annual precipitation trend in the Mississippi River – Grand Rapids watershed, the number of severe storm events in northeast Minnesota has increased since 1950 (Graphic 5)"</p> <p>EAW December 2024 (as modified) "The Mississippi River – Grand Rapids watershed has experienced an upward trend in annual precipitation, accompanied by an increase in the frequency of severe storm events in northeast Minnesota since 1950 (Graphic 7.2). [R2_Cmt_#349]"</p>

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350	7.a	930	Graphic 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>	The reference was removed.	<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>	<p>Thank you for the follow-up comment concerning the source for the data. The language in the EAW was edited to identify the 38 stations.</p> <p>EAW October 2023 (as written) "The data presented in Graphic 15 represents the number of 100-year storm events from 1916 to 2020 for 38 precipitation stations in Northeast Minnesota."</p> <p>Revised EAW December 2024 (as modified) "The data presented in Graphic 7.3 represents the number of 100 year storm events from 1916 to 2020 for 38 precipitation monitoring stations across northeastern Minnesota, including Ada, Canby, Cass Lake, Cloquet, Colledgeville, Crookston, Duluth, Faribault, Grand Marais, Grand Meadow, Grand Rapids, Gull Lake Dam, Hallock, Itasca, Leech Lake Dam, Milaca, Milan 1NW, Montevideo, Mora, Morris, MSP, Park Rapids, Pine River Dam, Pipestone, Pokegama, Red Wing, Redwood Falls (Municipal), Rochester, Sandy Lake Dam, St. Cloud, St. Peter, Tracy, Two Harbors, Waseca, Wheaton, Winnebago, Winnibigoshish, and Zumbrota. [R2_Cmt_#350]"</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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
353	7.a	957	Graphic 17	<p>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.</p> <p>Requested Action: Address Comment and edit as appropriate</p>	<p>Graphic 17 has been redone to clarify that the one model is the mean of the other 8 models.</p> <p>Replace existing graphs and add footnote defining Model Mean as the mean of the other 8 models</p>	<p>Resolved.</p> <p>Requested Action: None</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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354	7.a	965	Graphic 18	<p>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.</p> <p>Requested Action: Address Comment and edit as appropriate</p>	<p>Graphic 18 has been redone to clarify that the one model is the mean of the other 8 models.</p> <p>Replace existing graphs and add footnote defining Model Mean as the mean of the other 8 models</p>	<p>Resolved.</p> <p>Requested Action: None</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
355	7.a	969		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
356	7.a	969		<p>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).</p> <p>Requested Action: Address Comment and edit as appropriate</p>	<p>The EPA Streamflow Projections Map anticipates an increase in annual daily average streamflow by a ratio of &gt; 1.2 to 1.4 in 2071 to 2100 (RCP 8.5) compared to baseline historical flow (1976 to 2005) (reference (13)).</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
357	7.a	971		<p>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.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document</p>	<p>The EPA Streamflow Projections Map anticipates an increase in annual daily average streamflow by a ratio of &gt; 1.2 to 1.4 in 2071 to 2100 (RCP 8.5) compared to baseline historical flow (1976 to 2005) (reference (13)).</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Resolved.</p> <p>Requested Action: None</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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358	7.a	972		<p>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.</p> <p>Requested Action: Address Comment and edit as appropriate</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>	<p>Thank you for the comment. Talon acknowledges that climate conditions will continue to evolve post-closure, and once the site is fully reclaimed, natural climate variations will unfold independently of the project. Editing the text to specify "during the proposed project period" appropriately reflects this scope.</p> <p>EAW October 2023 (as written) "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>EAW December 2024 (as modified) "Project operations are anticipated to last 7-10 years and therefore long-term climate change, with the exception of the already observed increase in extreme rainfall events, would have minimal impact on the location, during the proposed project period. [R2_Cmt_#358]"</p>
359	7.a	972		<p>What if the project extends past 10 years? How will mine impacts be minimized after closure of 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>As stated in the EAW data submittal "The Project would have an approximately 7- to 10-year production life."</p>	<p>Resolved.</p> <p>Requested Action: None</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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362	7.b	976	Table 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>	<p>Thank you for your comment. Talon acknowledges that projections of long-term climate change impacts are speculative and that regional climate models provide a basis for evaluating potential effects on the proposed project. Given the duration of the mine life and the relatively minor climate changes predicted within this timeframe, Talon maintains that its original statement—that long-term climate changes are unlikely to have a major impact on the project—remains valid. Further evaluation of potential climate impacts will be provided in the Environmental Impact Statement (EIS).</p>
363	7.b	979	Table 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>	<p>Thank you for your comment. Additional climate considerations and adaptations have been added to the table.</p>

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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>	<p>Please see the response to comment number 358.</p>
365	7.b	979	Table 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 Adaptations.</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>	<p>Thank you for your comment. The original project design, as detailed in the June 2023 EAW data submittal, proposed an open surface footprint, which included areas of potential contamination from ore and waste rock. This configuration necessitated a robust stormwater management plan to collect, treat, and discharge contact water generated during storm events, with sizing aimed at managing up to a 200-year 24-hour storm event. Talon has since revised the design (EAW December 2024) to enclose these components, effectively eliminating the sources that would have required capture and treatment.</p> <p>With the updated enclosed design, stormwater falling on the surface is no longer exposed to contaminants from the mine and can now be managed under industrial stormwater regulations. This adjustment removes the need for extensive contact water management system to handle large storm events, as the facility no longer generates from storm events contact water requiring specialized treatment. This redesign enhances the project's resilience to climate change impacts by reducing vulnerability to contact water management challenges associated with large storm events, resulting in a more effective approach to stormwater management.</p>
366	7.b	979		<p>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.</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>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None</p>	<p>Please see the response to comment number 365.</p>

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367	7.b	983	Table 4	<p>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?</p> <p>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.</p>	<p>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.</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>	<p>Please see the response to comment number 365.</p>
368	7.b	983	Table 4	<p>Explain how water resources will be unaffected if wetlands will be lost and flooding could occur.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>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</p>	<p>RGU notes that FSD will require complete assessment of project-related cover type change and water management and potential for impacts.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
369	7.b	984	Table 4	<p>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.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p> <p>The Project will address this issue, as necessary, in the EIS.</p>	<p>Resolved for the purpose of scoping.</p> <p>Requested Action: None</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
370	7.b	984	Table 4	<p>Consider additional adaptation strategies like planting native vegetation that also improve biodiversity and wildlife habitat.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Additional buffer strips and vegetation would be planted where feasible. Native species would be used to improve biodiversity and wildlife habitat where feasible.</p>	<p>Resolved.</p> <p>Requested Action: None</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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371	7.b	985		<p>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 fish/wildlife/plant ecosystems in receiving water bodies, etc..) to substantiate this claim.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p>	<p>Follow Up – Proposer is encouraged to modify the text of the EAW as per the comment.</p> <p>Requested Action: Edit text as requested.</p>	<p>Comment is noted.</p> <p>The Project will address this issue, as necessary, in the EIS.</p>
372	7.b	985		<p>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.</p> <p>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).</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Comment is noted.</p> <p>The Project will address this issue, 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
373	8	988	Table 5	<p>In Table 5, Please provide clarification on where the wetland cover type change is occurring.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>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?</p>	<p>Resolved</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>



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374	8	988	Table 6	<p>Were possible future green infrastructure and incorporation into project design considered when developing Table 6?</p> <p>Requested Action: Answer question.</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 for the purpose of scoping.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
375	8	990	Table 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 (&lt;2 meters deep) and ditches "for row 1.</p>	<p>Resolved</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
376	8	991	Table 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
377	8	994	Table 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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378	8	994	Table 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
379	8	994	Table 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
380	8	994	Table 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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381	8	996	Table 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
382	8	999	Table 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
383	9	1001	Table 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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384	9	1008	Table 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>	Comment is noted.	<p>Not resolved.</p> <p>Requested Action: Add text as original comment requested.</p>	<p>Thank you for your comment. While the initial request to include the Office of the State Archaeologist (OSA) License requirement was noted as advisory, Talon acknowledges the importance of meeting all applicable state requirements for archaeological work. In light of this, Talon will add a reference to the OSA License in the relevant table to ensure clarity and compliance for any archaeological activities conducted on non-federal state and public lands as part of the project.</p> <p>The "Summary Of Required Permits/Approvals" table was edited with:</p> <p>EAW December 2024 MN Department of Administration State Archaeologist Office of the State Archaeologist (OSA) License</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>	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>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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
386	9	1008		<p>If known, what federal, state, or local permits and approvals are needed for the North Dakota project components?</p> <p>Requested Action: Answer question.</p>	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>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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387	10.a.i	1017		<p>There should be a discussion regarding safeguard of Tribal treaty resources in this section.</p> <p>Requested Action: Address comment; modify text as warranted.</p>	<p>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.</p>	<p>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."</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for your comment. Talon has edited the language in the land use description as follows:</p> <p>EAW October 2023 (as written) "The Project is in Aitkin County on a combination of state and private lands within the 1855 Treaty boundary"</p> <p>EAW December 2024 (as modified) "The Project is in Aitkin County on a combination of state and private lands within the 1855 Treaty boundary, and is located approximately 3 miles west of the adjudicated 1854 Treaty area. Talon recognizes and respects Native American communities retained rights to hunt, fish and gather. [R2_Cmt_#387]"</p>
388	10.a.i	1017		<p>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).</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>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.</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for your comment. Talon has incorporated additional language into the land use description that provides context for the location of the project with respect to the Savanna State Forest.</p> <p>The EAW was edited as follows:</p> <p>EAW December 2024 "Portions of the Project Area would lie within Savanna State Forest, which would include a small section of surface infrastructure as well as portions of the underground mine. [R2_Cmt_#388]"</p>
389	10.a.i	1017		<p>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.</p> <p>Requested Action: Consider comment; edit text as warranted. Future discussion topic 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>	<p>Thank you for the initial comment. Please see the response to comment number 646 that address this under Question 15.</p>
390	10.a.i	1019		<p>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.</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 SEAW/DSDD.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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				Requested Action: Consider comment; edit text as warranted.		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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
394	10.a.i	1028		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
395	10.a.i i	1042		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.  Requested Action: Consider comment; edit text as warranted.	Comment is noted.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
396	10.a.i ii	1051	Figure 6	There is no figure that clearly illustrates public vs private land. That could be on this figure or a separate figure.  Requested Action: Consider comment; edit text as warranted.	The Project added state/private land designation to Figure 6.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
397	10.a.i ii	1058		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.	Comment is noted.  For further details concerning the contents of the Ordinance, please see Reference 17 of the EAW.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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				Requested Action: Consider comment; edit text as warranted.		Requested Action: None.	
398	10.a.i v	1066		FEMA is updating their floodplain mapping. What data was used to make this determination?  Requested Action: Answer Question; edit text as needed	The reference is located on Figure 13.  FEMA Flood Insurance Rate Map (FIRM)  2706280210B eff date 3/15/1982  2706280220B eff date 3/15/1982  2706280300B eff date 3/15/1982	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
399	10.a.i v	1066		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Thank you for the comment. Future discussion item, as necessary, in the development of the DSDD. The text of the EAW has been edited as follows:</p> <p>EAW October 2023 (as written) "No critical Project facilities would be located in FEMA-delineated floodplains or areas identified as at risk for localized flooding."</p> <p>EAW December 2024 (as modified) "No critical Project facilities would be located in Federal Emergency Management Agency (FEMA)-delineated floodplains or areas identified as at risk for localized flooding. Additionally, the Project has eliminated the outside storage of materials that could be potentially hazardous, further reducing potential risks related to flooding. Furthermore, during the June 2012 500-year event, which saw between 7 to 10 inches of rainfall in a 24-hour period, the proposed upland location for the main surface facility was not affected by flooding. Given these measures and the site's resilience during past extreme events, the Project is well-positioned to mitigate potential flood-related risks. Additional assessment work will be performed including hydrology and hydraulic modelling for the EIS. [R2_Cmt_#400]"</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>



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402	6.b	1084		<p>The RGU offers the following notes:</p> <ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <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>	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>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>	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
403	11.a	1084	Figure 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>	Detailed descriptions of the surficial and bedrock geology will be provided in the EIS.	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
404	11.a	1100		<p>There needs to be a discussion of structure and hydrogeology somewhere in this section</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	Structural geology and further detailed hydrogeology (groundwater) of the Project will be provided in the EIS.	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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 =&gt; Hornblende =&gt; 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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 &amp; 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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412	11.a	1112		If the cobalt, platinum, palladium, and gold will be extracted from the ore that needs to be indicated in the project description.  Requested Action: Consider comment; edit text as warranted.	Please see Response to Comment #35.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
413	11.a	1118		What is the proportion of each of the three basic types of mineralization in the TIC?  Requested Action: Answer question. Edit text as necessary	Is this question intended to be for the TIC or for the Tamarack Mining Project?  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.	Follow-up: What is the proportion of each of the three basic types of mineralization in the Tamarack Mining Project area?  Requested Action: Answer question and update EAW as necessary.	Thank you for your comment. The EAW has been edited to include the approximate proportions of the basic mineralization as follows:  EAW October 2023 (as written) "Mineralization within the TIC can be divided into three basic types: a massive sulfide unit hosted in the metamorphosed sediment; a semi-massive sulfide unit composed of net textured sulfides within the intrusion; and a disseminated sulfide unit composed of mostly intrusive rock with discrete sulfide blebs."  EAW December 2024 (as modified) "Mineralization within the TIC can be divided into three basic types: a massive sulfide unit (MSU) hosted in the metamorphosed sediment (~12.5%); a semi-massive sulfide (SMSU) unit composed of net textured sulfides within the intrusion (~37.5%); and a disseminated sulfide unit composed of mostly intrusive rock with discrete sulfide blebs (~50%). [R2_Cmt13]"
414	11.a	1121		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
415	11.a	1123		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  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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416	11.b	1140		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  Requested Action: Consider comment; edit text as warranted.	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.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
417	11.b	1140	Figure 10	Recommend using a different color for the Soil Unit as the green blends with the background.  Requested Action: Review for accessibility; modify figure if needed	Soil unit colors have been updated on Figure 10 Soils.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
418	11.b	1143		What is the volume and acreage of peat and much that would be removed for building the site?  Requested Action: Answer question. Edit text as necessary	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.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Thank you for your comment. The revised project design remains focused on strategies to minimize environmental impacts, with specific measures aimed at limiting soil disturbance and subsidence.

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423	11.b	1159	Table 10	<p>These numbers do not indicate if potential remediation of peat soils would require additional excavation. This potential should be considered in excavation estimates.</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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
424	12.a.i	1170		<p>The potential impacts resulting from changes to surface water flows should be evaluated in the EIS.</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.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
425	12.a.i	1170		<p>Will there be in-field delineations of floodplains in addition to the FEMA-delineated floodplains?</p> <p>Requested Action: Answer question.</p>	<p>The need for additional floodplain delineation will be considered when developing the technical approach that will support the Project's EIS data submission.</p>	<p>Forward verbatim.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
426	12.a.i	1180		<p>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.</p> <p>Requested Action: Answer question and update EAW as appropriate.</p>	<p>Text updated in the EAW.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
427	12.a.i	1183		<p>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.</p> <p>Requested Action: Answer question and update EAW as appropriate.</p>	<p>Distances from the Project Area to Tamarack River, Minnewawa Creek, Sandy River, Tamarack Lake and Big Sandy Lake are illustrated on Figure 11.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still 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: <a href="https://www.revisor.mn.gov/statutes/cite/103G.005">https://www.revisor.mn.gov/statutes/cite/103G.005</a></p>	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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430	12.a.i	1187		How will the protection of the wild rice waters be ensured & are relevant tribal governments or stakeholders being consulted for their input?  Requested Action: Answer question.	Comment is noted.  Tribal Governments have been, and will continue to be, consulted regarding wild rice.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
431	12.a.i	1188		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.  Requested Action: Regulatory guidance. Future discussion item.	Comment is noted.  The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.  Future discussion item, as necessary, in development of DSDD.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
432	12.a.i	1196	Table 11	Round Lake (WID = 01-0023-00) should also be listed as a water used for the production of wild rice  Requested Action: Address comment and update EAW as appropriate.	Comment is noted.  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.  <a href="https://files.dnr.state.mn.us/fish_wildlife/wildlife/wildrice/statewide-inventory-wild-rice-waters.pdf">https://files.dnr.state.mn.us/fish_wildlife/wildlife/wildrice/statewide-inventory-wild-rice-waters.pdf</a>	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.  Requested Action: Make changes with available updates; advisory for future iterations.	Talon has reviewed the recently update Impaired Water List issued by the MPCA , and has amended the EAW accordingly.  Data source: <a href="https://public.tableau.com/app/profile/mpca.data.services/viz/wild_rice_v4/Information">https://public.tableau.com/app/profile/mpca.data.services/viz/wild_rice_v4/Information</a> and 2024 Minnesota Impaired Water List [R2_Cmt_#432]
433	12.a.i	1196	Table 11	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.  Requested Action: Address comment and update EAW as appropriate.	Aitkin County Shoreland Ordinance (amended 2017) was acknowledged and the EAW updated.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
434	12.a.i	1221		What reference was used to determine public waters?  Requested Action: Address comment and update EAW as appropriate.	Reference updated in the EAW from Reference #25 to Reference #21: Minnesota Department of Natural Resources. Public Waters Inventory (PWI) Maps.  <a href="https://www.dnr.state.mn.us/waters/watermgmt_section/pwi/maps.html">https://www.dnr.state.mn.us/waters/watermgmt_section/pwi/maps.html</a> .	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
435	12.a.i	1250		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.  Requested Action: Future discussion item.	Comment is noted.  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.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.



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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 (SO<sub>2</sub>) 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 (SO<sub>2</sub>) 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Please see the response to comment number 365.</p>

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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 monitored.</p> <p>Requested Action: Modify text to address comment.</p>	<p>Details such as monitoring locations, frequency and parameters needs to be discussed in context of the objectives, setting, conceptual models, mine plan and limitations from such factors as access, weather and safe working conditions which is most appropriate for the EIS. Talon is of the opinion that a high level overview is appropriate for the EAW. The following text was added to the EAW:</p> <p>"Talon has been collecting water resources (surface water, wetlands and groundwater) monitoring data since 2007 with over 200 monitoring locations for water quality, flow and/or water level measurements with various active durations within the Project Area and vicinity. Monitoring stations and parameters were adjusted using a scientific, iterative approach by continuously reviewing data and updating the monitoring program as needed for continuous improvement. The data frequency depends on the parameter and objectives with for example a quarterly frequency for routine water quality monitoring, with greater frequency for select times and events, to hourly for routine water level measurements, with a greater frequency used for select events such as for hydraulic tests and for select parameters. Data collection and review is ongoing and being integrated with other data sources such as climate and geology information. [R2_Cmt_#440] "</p>
441	12.a.i	1255		<p>Will monitoring of surface water flow and quality be of the same, or similar, frequency during mine operation?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Required monitoring during operations will be determined as part of the Environmental Review and/or Permitting stages of the project.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
442	12.a.i	1255		<p>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.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>See Response to Comment #440.</p>	<p>Forward verbatim.</p> <p>Requested Action: Modify text to address comment.</p>	<p>Please see the response to comment number 440.</p>

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443	12.a.i	1255		<p>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).</p> <p>Requested Action: Regulatory guidance. Consult DNR Lands and Minerals regarding potential groundwater models.</p>	<p>Comment is noted.</p> <p>Future discussion item, as necessary, in development of DSDD.</p>	<p>Forward verbatim.</p> <p>Requested Action: Advisory.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
444	12.a.i	1255		<p>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.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>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.</p>	<p>Forward verbatim.</p> <p>Requested Action: Add text to address comment.</p>	<p>The following text was added to the EAW:</p> <p>EAW December 2024 "Monitoring data would be provided, as necessary, as part of the EIS submission. [R2_Cmt_#444]"</p>
445	12.a.i	1255		<p>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.</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
446	12.a.i	1255		<p>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.</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
447	12.a.i	1255		<p>Does Talon propose to tailor the water model to address different potential operating conditions (full operation; partial shutdown; temporary idle; or similar)?</p> <p>Requested Action: Answer question.</p>	<p>Comment is noted.</p> <p>Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
448	12.a.i	1255		<p>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?</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Thank you for your question. Talon may consider various methods, including LiDAR survey data, for assessing current topography and analyzing potential hydrological changes. Specific methodologies and data sources to support these analyses will be determined and presented in the EIS data submittal.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon will discuss and provide the surface water conceptual model as part of the EIS process. A primary purpose of the conceptual model description is to enable the vast quantity of data related to the Project to be placed into an overall context so that it is more readily understood. No changes to EAW as not pertinent to (12.a.i.) but will be discussed in the EIS data submittal.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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457	12.a.i	1263	Figure 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>Requested Action: Advisory. Regulatory guidance. Future discussion item.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
459	12.a.i	1266		<p>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.</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted.</p> <p>Data collected in the wetlands and the associated analyses will be provided in the EIS data submittal.</p>	<p>Resolved at this stage. To be addressed in the EIS</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
460	12.a.i	1266	Figure 14	<p>The color chosen to represent the "National Wetlands Inventory" (NWI) is very faint. Choose a color that is more visible.</p> <p>Requested Action: Address comment and update Figure 14 as appropriate.</p>	<p>Figure 14 has been updated to improve color contrast for the NWI.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
461	12.a.i	1269		<p>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.</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 addressed in the EIS</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
462	6.b	1272		<p>RGU notes it will be necessary to describe potential groundwater flow impacts resulting from peat excavation.</p> <p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

Comment No.	EAW Item	Starting Line No.	Table; Figure; Graphic	Round 1 Comment and RGU Request 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Request 2/4/2024	Talon Response and Treatment in EAW 12/12/2024
468	12.a.i	1272		<p>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.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>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.</p> <p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
469	12.a.i	1272		<p>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.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>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.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
470	12.a.i	1272		<p>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).</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>Forward verbatim.</p> <p>Requested Action: Advisory. To be discussed in development of SEAW/DSDD.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
471	12.a.i	1272		<p>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.</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>Forward verbatim.</p> <p>Requested Action: Advisory. To be discussed in development of SEAW/DSDD.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
472	12.a.i	1272	Figure 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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.



Comment No.	EAW Item	Starting Line No.	Table; Figure; Graphic	Round 1 Comment and RGU Request 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Request 2/4/2024	Talon Response and Treatment in EAW 12/12/2024
473	12.a.i i	1282		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?  Requested Action: No action necessary. Comment refers to existing MWI wells.	Comment is noted.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
474	12.a.i i	1282	Figure 15	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?  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.	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.	Forward verbatim.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
475	12.a.i i	1282		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.  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.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
476	12.a.i i	1282		"Johnson's Beaver Pond", identified within the MN Spring Inventory, may be within 20 miles.  Requested Action: Note comment.	Comment is noted.  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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
477	6.b	1290		Assessment of potential impacts to drinking water wells should include the TBM.  Requested Action: Consider comment; edit text as needed.	Comment is noted.  The Project will address, as necessary, this issue in the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
478	12.a.i i	1290	Figure 15	Plans to monitor surrounding water supply wells during mine dewatering should be discussed.  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 discussed in development of the SEAW/DSDD.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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						Requested Action: None.	
479	12.a.i i	1290	Figure 15	Are piezometers part of the monitoring well network?  Requested Action: Answer question and update EAW as appropriate.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
480	12.a.i i	1290		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
481	12.a.i i	1305	Figure 15	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.  Requested Action: Regulatory guidance. Future discussion item.	Comment is noted.  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.  Future discussion item, as necessary, in development of DSDD.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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482	12.a.i i	1305		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
483	12.a.i i	1305		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?  Requested Action: Answer question and update EAW as appropriate.	Comment is noted.  Please provide more detail on this Comment.	Forward verbatim.  Requested Action: Answer question; modify text as warranted.	Thank you for your comment. For clarification, could you please specify the extent of the area of interest beyond the "Mississippi Watershed"? The project area lies within the Upper Mississippi Region, designated by HUC 07, which includes multiple sub-watersheds flowing into the larger Mississippi River Basin. Within this HUC region, specific sub-watersheds encompass local drainage systems and tributaries that feed into the Mississippi River. Properly identifying the area of interest will help us respond to the comment.
484	12.a.i i	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.	The groundwater monitoring program includes wells and multi-zone vibrating wire piezometer installations completed in the peat, the quaternary and the bedrock. Existing water supply wells within and near the Project Area, as discussed above, are completed within the quaternary, The details for the monitoring network will be discussed and reported on in the EIS data submittal. No changes to EAW as not pertinent to (12.a.ii.) but will be discussed in the EIS.
485	12.a.i i	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 1031.	Forward verbatim.  Requested Action: Add text to address comment.	All applicable wells and borings will be sealed in accordance Minnesota Rules Chapters 4725 and 4727 and Minnesota Statutes Chapter 1031. No changes to EAW as not pertinent to (12.a.ii.) but will be discussed in the EIS.
486	12.a.i i	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.	Comment is noted.  The Project will address, as necessary, this issue in the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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				Requested Action: Future discussion item.			
487	12.a.i i	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
488	12.a.i i	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
489	12.a.i i	1305	Figure 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
490	12.a.i i	1305	Figure 15	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.  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.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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491	12.a.i i	1305		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.  Requested Action: Answer question.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
492	12.a.i i	1305		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?  Requested Action: Answer question.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
493	12.a.i i	1305		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?  Requested Action: Answer question.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
494	12.a.i i	1305		Does Talon propose to configure the groundwater impact models so that the results can be used in the surface water and wetland impact assessments?  Requested Action: Answer question.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
495	12.a.i i	1305		Does Talon propose for groundwater modeling to assess project-related groundwater depressurization effects during operations?  Requested Action: Answer question.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
496	12.a.i i	1305		Has Talon identified potential pathways for how contact water or industrial groundwater could be released to groundwater?  Requested Action: Answer question.	Comment is noted.  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.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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497	12.a.i i	1305		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.  Requested Action: Answer question.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
498	12.a.i i	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
499	12.a.i i	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
500	12.a.i i	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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501	12.a.i	1309		<p>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 &amp; 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?</p> <p>Requested Action: Answer question and update EAW as appropriate.</p>	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.	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
502	12.a.i	1312		<p>Depth to groundwater should be mapped in a figure with the proposed project features overlain for clarity.</p> <p>Requested Action: Provide requested figure.</p>	Figure 16 has been updated to include the proposed project features.	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
503	12.a.i	1312	Figure 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>	<p>The following sentence was added to the EAW:</p> <p>EAW December 2024 "The depth to water map will be updated with site-specific data for the EIS data submittal. [R2_Cmt_#503]"</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>	Additional modeling will be performed to include all relevant data collected since 2020 to support and inform the EIS data submission.	<p>Forward verbatim.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	Comment is noted.	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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 treated water would affect water resources." Provide modeling/data to support this conclusion.</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>Forward verbatim.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
509	12.b.i	1333		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>



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510	12.b.i	1333		<p>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.</p> <p>Requested Action: Comment noted. This Section of EAW specifically requests information on impacts to surface and groundwater, not fish and wildlife.</p>	<p>Comment is noted.</p> <p>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.</p>	<p>0</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
511	12.b.i	1335		<p>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.</p> <p>Requested Action: Update the EAW with the requested information.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
512	12.b.i	1344		<p>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)?</p> <p>Requested Action: Answer questions and update EAW as appropriate.</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>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>The EAW was updated as follows:</p> <p>EAW December 2024          "One source of contact water is mine inflow. A preliminary estimate of mine inflow is provided here, based on limited bedrock hydrogeological information available in 2020 and using a screening calculation method commensurate with the data available prior to 2020. The significant amount of additional data that has been collected since 2020 is in the process of being reviewed, analyzed and integrated with geologic, structural geologic, geophysical and geochemistry data that would be presented in the EIS data submittal. Overall, Talon is following a scientific process for the initial inflow estimate presented in the EAW with the intent to provide a conservative, high-end estimate, given the limited data that was available at the time of the initial assessment, that is likely to over-estimate the actual inflows. Future iterations of inflow predictions would include consideration of additional data collected since 2020, additional integration with geologic, structural geologic, geophysical and geochemistry data and the use of a three-dimensional numerical groundwater model. This is the general approach used for the Eagle Mine in Michigan with pre-mining inflow estimates in the range of 75 gpm (base case or expected rate, 284 L/min) to 220 gpm (upper bound estimate, 833 L/min) (Wardell Armstrong, 2013), with actual inflows typically less than 10 gpm (38 L/min) as documented in 2023 (WSP Golder, 2023). [R2_Cmt_#513]"</p> <p>"The preliminary peak life-of-mine inflow calculation is 800 gpm. The estimate is based on the frequency of water conductive zones encountered in the hydraulic testing of four bedrock boreholes available prior to 2020 and using an analytical equation to calculate a mine inflow rate on a conductive zone basis that assumes the conductive zones have Project scale connectivity. The conductive zone frequency and rate were then multiplied by the length of the mine development to calculate the total mine inflow rate. To be conservative, a range of 800-1,600 gpm (3,028-6,057 L/min) was developed by multiplying the calculated rate of 800 gpm (3,028 L/min) by a factor of two. [R2_Cmt_#134] [R2_Cmt_#244] [R2_Cmt_#958] This preliminary estimate was designed to provide a conservative, higher-end value, as, for example, does not include inflow mitigation such as grouting or other methods. The inflow estimate would be refined and updated for the EIS to reflect the updated mine plan, additional hydrogeological information, including multiple day pumping tests, from ongoing studies, mitigation methods and a rigorous modeling method that is commensurate with the</p>

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							significant amount of additional data collected since 2020. [R2_Cmt_#513]"
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Please see the response to comment number 365.</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>	<p>Please see the response to comment number 516.</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 discussion is needed to regarding the maximum storm size that will need to be evaluated.</p> <p>Requested Action: Future discussion item.</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>	<p>Please see the response to comment number 516.</p>
519	12.b.i	1357		<p>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.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>See Response to Comment #516.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Please see the response to comment number 516.</p>

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520	12.b.i	1358		<p>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.</p> <p>Requested Action: Address comment and update EAW as appropriate. Future discussion item in development of Draft Scoping Decision Document.</p>	<p>Comment is noted.</p> <p>See Response to Comment #516.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Please see the response to comment number 516.</p>
521	12.b.i	1364		<p>Information on treatment plant design and the data used will need to be provided.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
522	12.b.i	1368		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
523	12.b.i	1368		<p>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.)</p> <p>Requested Action: Future discussion item.</p>	<p>Comment is noted. The Project will address, as necessary, this issue in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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528	12.b.i	1379		Does Talon propose to use detailed reporting from the PART and any other analyses regarding assessment of baseflow?  Requested Action: Answer question.	Modeling and analysis methods for baseflow separation determination will be used to develop conceptual models informed by data collected in relevant streams and ditches.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
529	12.b.i	1384		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
530	12.b.i	1387		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).  Requested Action: Provide information regarding the sources of information	Comment is noted.  The methodology and sources for future climate change projections used in the various assessments will be detailed for the EIS data submittal.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
531	12.b.i	1387		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).  Requested Action: Provide information regarding the sources of information	Comment is noted.  Models will be subjected to a sensitivity analysis to consider the range from the climate models for relevant climate parameters.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
532	12.b.i	1387		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?  Requested Action: Address comment and update EAW as appropriate.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>To address the comment the following sentence as added to the EAW:</p> <p>EAW December 2024 "The methodology and sources for future climate change projections used in the various assessments would be detailed in the EIS data submittal. [R2_Cmt_#533]"</p>
534	12.b.i	1390		<p>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).</p> <p>Requested Action: Advisory only. Future discussion item for 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>Resolved at this stage. To be addressed in the EIS</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
535	12.b.i	1399		<p>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?</p> <p>Requested Action: Address comment. 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: None.</p>	<p>Thank you for your question. The amended project design has eliminated the surface features that required extensive infrastructure for stormwater management. The following text was edited in the EAW:</p> <p>EAW October 2023 (as written) "Stormwater is also generated from the contact water area (Figure 4). This water is collected and sent to the water treatment plant Contact Water Treatment Plant where it would be treated to meet applicable permit requirements prior to discharge. 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."</p> <p>EAW December 2024 (as modified) "At the surface, all ore and waste rock handling and storage would be performed within an enclosed building with an impervious surface with contact water within the building collected and routed to the Contact Water Treatment Plant facility. As a result, there would be no surface contact water produced from storm events."</p>



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536	12.b.i i	1399		<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: Address comment and update EAW as appropriate.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>In response to addressing the comment the following paragraph has been edited:</p> <p>EAW October 2023 (as written) "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. Limited to no effect is expected because, as noted in Item 12.b.i.3 , the water balance in the area (precipitation and evapotranspiration) and the patterns of large precipitation events are expected to remain in the current range during the timeframe that the Project would be operational. Any potential effects would be mitigated by the same factors discussed above: control of stormwater discharge volumes and rates, stormwater treatment systems, compliance with industrial stormwater requirements under an NPDES/SDS permit and contact water management."</p> <p>EAW December 2024 (as modified) "Based on qualitative review of the current Minnesota climate trends and anticipated changes in rainfall frequency, intensity, and amount, future climate changes are not expected to significantly influence the environmental effects from stormwater discharges on receiving waters. Limited to no effect is expected because, as noted in reply to Section 12.b.i.3), the water balance in the area and the patterns of large precipitation events are expected to remain in the current range during the timeframe that the Project would be operational. Any potential effects would be mitigated by the same factors discussed above: control of stormwater discharge volumes and rates, industrial stormwater treatment systems, compliance with industrial stormwater requirements under an NPDES/SDS permit. Additional quantitative assessments would be performed and provided in the EIS data submittal. [R2_Cmt_#536]"</p>
537	12.b.i i	1434		<p>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"?</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>Comment is noted.</p> <p>See Response to Comment #536.</p>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
538	12.b.i i	1436		<p>Extreme rainfall events must be consider in the design of the stormwater treatment system.</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>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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						Requested Action: None.	
539	12.b.i i	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.	Please see the response to comment number 516.
540	12.b.i i	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.	The EAW was amended in response to this comment, as follows:  EAW December 2024 "The watershed drains to the Tamarack River through a public drainage system that consists of a ditch and an altered natural stream (Figure 7). [R1_Cmt_#279] The specific discharge location for the Water Treatment Plant would be decided by additional design development and would be presented in the EIS. [R2_Cmt_#540] [R2_Cmt_#269]"
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
542	12.b.i i	1444		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.  Requested Action: Provide additional information on overall discharge plans and update EAW as appropriate.	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.	Forward verbatim.  Requested Action: Edit figure if possible	Please see the response to comment number 540.
543	12.b.i i	1450		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.  Requested Action: Address comment.	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.	Resolved.  Requested Action: None.	Please see the response to comment number 365.

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544	12.b.i i	1453		Clarify meaning. How will discharge of treated water mitigate altered surface hydrology in the immediate vicinity of the project area?  Requested Action: Address comment.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
545	12.b.i i	1459		See comment about Item number 7.a., Line number 901-975. (Future climate projections and additional information about past climate can be found at <a href="http://www.heat.gov">www.heat.gov</a> and <a href="http://www.heat.gov/pages/climate-explorer">www.heat.gov/pages/climate-explorer</a> )  Requested Action: Note comment.	Comment noted and reference received.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
546	12.b.i i	1461		Were closure and reclamation periods considered in addition to the operation periods?  Requested Action: Answer question and update EAW as appropriate.	The EIS will consider climate projections for all phases of the Project. 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
547	12.b.i i	1461		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.  Requested Action: Address comment and update EAW as appropriate.	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.	Forward verbatim.  Requested Action: Provide supporting information as requested.	Thank you for your question. The EAW has been updated as follows:  EAW October 2023 (as written) "The Project's water use of potable water would be resilient with respect to climate trends, because groundwater supply is expected to remain in the current range during the timeframe that the Project would be operational."  EAW December 2024 (as modified) "The Project's water use of potable water is expected to be resilient with respect to climate trends based on a qualitative review of the discussion in the Climate Adaption and Resilience section (See Figure 1 in USGS, 2017) that suggests the groundwater supply is expected to remain in the current range during the timeframe that the Project would be operational. Consistent with the discussion above, the Project Area is within a regional area that is mapped as low risk regarding water supply sustainability in Year 2050 that considers factors such as but not limited to climate change (USGS, 2017; see Figure 1). In addition, the aquifer sustainability would be evaluated quantitatively with a three-dimensional groundwater model that would include climate projections and presented in the EIS data submittal. [R2_Cmt_#547][R2_Cmt_#550]"

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548	12.b.i i	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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
549	12.b.i ii	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>	<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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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550	12.b.i ii	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>	<p>Forward verbatim.</p> <p>Requested Action: Answer question and modify text as warranted.</p>	<p>Other potential uses of groundwater are for non-potable uses that are discussed in the EAW. Added the following text to the EAW:</p> <p>EAW December 2024            "Based on preliminary site investigations and the presence of thick, saturated quaternary sediments, adequate groundwater is available in the Quaternary deposits. The Project's water use of potable water is expected to be resilient with respect to climate trends based on a qualitative review of the discussion in the Climate Adaption and Resilience section (See Figure 1 in USGS, 2017) that suggests the groundwater supply is expected to remain in the current range during the timeframe that the Project would be operational. Consistent with the discussion above, the Project Area is within a regional area that is mapped as low risk regarding water supply sustainability in Year 2050 that considers factors such as but not limited to climate change (USGS, 2017; see Figure 1). In addition, the aquifer sustainability would be evaluated quantitatively with a three-dimensional groundwater model that would include climate projections and presented in the EIS data submittal.            [R2_Cmt_#547][R2_Cmt_#550] "</p>
551	12.b.i ii	1470		<p>What is the current expected need of non-potable water?</p> <p>Requested Action: Address comment.</p>	<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.</p>	<p>Forward verbatim.</p> <p>Requested Action: None.</p>	<p>Thank you for your feedback. To ensure that we fully understand and address your comment, could you kindly clarify the request? Specifically, we would like to confirm whether there is a need for additional information or if you intended to convey that no further response is required at this time. Any additional guidance would be appreciated to align our response accurately with your expectations.</p>
552	12.b.i ii	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>	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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553	12.b.i ii	1488		How would the removal of groundwater be temporary? Would water be pumped back into the ground?  Requested Action: Address comment and update EAW as appropriate.	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
554	12.b.i ii	1488		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.  Requested Action: Comment noted. Addressed in other comments. EAW indicates that conceptual and quantitative groundwater flow models will be developed.	Comment is noted.  The Project will address, as necessary, this issue in the EIS.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
555	12.b.i ii	1488		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.  Requested Action: Address comment and update EAW as appropriate.	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.	Forward verbatim.  Requested Action: Add text to address comment.	The following text was added to the EAW:  EAW December 2024 "Refinement in the volumes and timing of withdrawals for construction activities would be developed as the details for the design progresses. The projected groundwater withdrawals would be included in a numerical groundwater model and used for the development of an appropriate monitoring program during construction. [R2_Cmt_#555]"
556	12.b.i ii	1489		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.  Requested Action: Address comment and provide requested figure.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
557	12.b.i ii	1493		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?  Requested Action: Address the questions in the comment and update EAW as appropriate. Respond to questions as	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.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Please see the response to comment number 555.

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				known. Future discussion item in the development of the Draft Scoping Decision Document.			
558	12.b.i ii	1493		The methods and data used to estimate groundwater pumping rates for temporary construction dewatering should be provided.  Requested Action: Future discussion item.	This would be refined, updated and more detail would be provided for the EIS data submittal when the engineering design is sufficiently developed.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
559	12.b.i ii	1494		Total water usage estimated at 50 million gpy. Does this include potable water (see line 1501)?  Requested Action: Address comment and update EAW as appropriate.	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
560	12.b.i ii	1494		How will the volume of water be monitored/determined?  Requested Action: Address comment.	Comment is noted.  See Response to Comment #557.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
561	12.b.i ii	1494		DNR will need to determine if construction dewatering will be covered under General Permit 1997-0005 or an individual water appropriation permit.  Requested Action: Regulatory guidance. Future discussion item.	Comment is noted.  Future discussion item, as necessary, in development of DSDD.	Forward verbatim.  Requested Action: Modify text to address comment.	Added the following text:  EAW December 2024 "Talon understands that DNR would need to determine if construction dewatering would be covered under General Permit 1997-0005 or an individual water appropriation permit. [R2_Cmt_#561]"

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562	12.b.i ii	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
563	12.b.i ii	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
564	12.b.i ii	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
565	12.b.i ii	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
566	12.b.i ii	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
567	12.b.i ii	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.



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568	12.b.i ii	1518		<p>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.</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. Indicates that conceptual and quantitative groundwater flow models will be developed. To be addressed in the EIS</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
569	6.b	1523		<p>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.</p> <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>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.</p>	<p>Forward verbatim.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
570	12.b.i ii	1523		<p>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 level on water quality should also be considered including mercury, DOC, and sulfate &amp; sulfide concentrations.</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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
571	12.b.i ii	1523		<p>The hydrogeochemical evaluation should include assessment of the risk of Acid Mine Drainage and other mechanisms of contaminant mobilization.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
572	12.b.i ii	1526		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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573	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
574	12.b.i v	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.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.  We would appreciate any examples of a mining project in Minnesota where an ecosystem-based approach has been applied, to better understand expectations and ensure our alignment with state standards.
575	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
576	12.b.i v	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.	Thank you for your comment. Banking is generally considered a preferred method for compensatory mitigation due to its track record for success and sustainability. Other mitigation options may also be considered, depending on the circumstances and the regulatory framework. The EIS will review potential mitigation approaches as necessary to determine what may be appropriate for the project.
577	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

Comment No.	EAW Item	Starting Line No.	Table; Figure; Graphic	Round 1 Comment and RGU Request 9/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 Response and RGU Request 2/4/2024	Talon Response and Treatment in EAW 12/12/2024
578	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
579	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
580	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
581	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
582	12.b.i v	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:	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
583	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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584	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
585	12.b.i v	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.	Talon has reviewed this comment in light of the amended design and has updated the following text:  EAW December 2024 "Conversion of the wetlands to uplands for the railway spur would use appropriate materials (e.g. coarse rock) or features (e.g. culverts) to enable water to flow across and/or under the developed surface to facilitate water movement between each side of it and address the potential for differences in water levels and/or other hydrological impacts. [R1_Cmt_#52] [R1_Cmt_#56] [R1_Cmt_#585] [R2_Cmt_#808] [R2_Cmt_#811] [R2_Cmt_#812]"
586	12.b.i v	1543		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?  Requested Action: Address the questions in the comment and update EAW as appropriate.	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.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
587	12.b.i v	1545		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?  Requested Action: Address comment and update EAW as appropriate.	The potential impacts to wetlands will be addressed in the EIS. Wetlands in the Project Area were delineated to a Level 3 standard.  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."	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
588	12.b.i v	1545		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?	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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				Requested Action: Address comment and update EAW as appropriate.			
589	12.b.iv	1548		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).  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
590	12.b.iv	1550		Describe how potential indirect impacts would be assessed.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
591	12.b.iv	1552		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?  Requested Action: Address comment and update EAW as appropriate.	Comment is noted.  Please clarify the question being asked.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action:	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
592	12.b.iv	1556		Are wetland bank credits the only mitigation method being considered for impacts to wetlands?  Requested Action: Comment noted. The EIS will examine other appropriate mitigations as necessary.	Comment is noted.	Forward verbatim.  Requested Action: Add text to address comment.	Please see the response to comment number 576.
593	12.b	1576	Table 8	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).  Requested Action: Address comment and update EAW as appropriate.	Comment is noted.  Abandonment of ditches is not proposed as part of the EAW.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
597	13.a	1593	Figure 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>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>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>

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				Requested Action: Consider comment; edit text as warranted.			
600	13.b	1625		<p>The EIS should evaluate options to maximize recycling of all waste generated by the Project.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
601	13.b	1630		<p>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?</p> <p>Requested Action: Answer question.</p>	<p>Overburden is not a mined material. Please clarify which stockpile or activity is being referred to in this Comment.</p>	<p>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?</p> <p>Requested Action: Answer question and update EAW as necessary.</p>	<p>Thank you for your question. The amended project design has eliminated surface stockpiling of overburden, so potential impacts of rainfall on such stockpiles and any related wetland water concerns are no longer applicable.</p>
602	13.c	1664		<p>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.</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 602 has not been addressed. Future discussion item.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>

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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.	We appreciate your continued interest in ensuring safe practices. The purpose of the EAW is to provide sufficient data to support the scoping decision for the project. Detailed procedures related to the use, spill response, cleanup, and proper disposal of hazardous materials will be further outlined in the relevant operational permits and management plans. These plans will ensure that activities comply with local, state, and federal regulations, demonstrating a commitment to safety and environmental responsibility.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
605	14.a	1751	Figure 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.	Talon has reviewed the Minnesota Pollution Control Agency (MPCA) impaired waters list, specifically focusing on water bodies supporting wild rice. Based on this review, the associated EAW text and figure have been updated to accurately reflect the presence of wild rice waters. These updates ensure that the project's documentation aligns with the current information available from the MPCA.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
607	14.a	1751		Natural Resources field surveys should include impacted areas outside of the Project perimeter as well.  Requested Action: Advisory; Future Discussion Item in 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.



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608	14.a	1751		Natural resources field survey information gathered for the EIS will need to be an ecosystem-based evaluation of potential impacts.  Requested Action: Advisory; Future Discussion Item in 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
609	14.a	1751		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.  Requested Action: Advisory; Future Discussion Item in 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.	Please see the response to comment number 400.
610	14.a	1759		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.  Requested Action: Consider comment; edit text as warranted.	Comment is noted.  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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
611	14.a	1761		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.  Requested Action: Future Discussion Item in 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.	Thank you for highlighting the importance of understanding the habitats for fish, reptiles, and amphibians in the project area. Talon acknowledges the value of thorough data gathering. We appreciate the information provided regarding the field observations conducted by the Great Lakes Indian Fish and Wildlife Commission (GLIFWC). Talon would welcome the opportunity to review any additional field observations or data from the Minnesota Department of Natural Resources to further enhance our understanding of the species and habitats present in the area. Access to such data would support a comprehensive evaluation of potential project impacts and facilitate informed decision-making throughout the EIS process.

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Thank you for the comment. The wild rice water bodies have been updated using the latest MPCA impaired waters list. The associated EAW text and figures have been updated to reflect the change.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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: <a href="https://www.dnr.state.mn.us/rsg/profile.html?action=elementDetail&amp;selectedElement=IIHYM24020">https://www.dnr.state.mn.us/rsg/profile.html?action=elementDetail&amp;selectedElement=IIHYM24020</a>). 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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617	14.b	1777		<p>This is a very cursory review of State-listed T&amp;E species. All species from the state list (link below) with the potential to exist on site should be evaluated.  <a href="https://files.dnr.state.mn.us/natural_resources/ets/endlist.pdf">https://files.dnr.state.mn.us/natural_resources/ets/endlist.pdf</a></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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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, 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.</p> <p>A Natural Heritage</p>	<p>Thank you for your comment regarding the Natural Heritage Review (NHR). Before moving forward with the submittal of the proposed project, Talon would like to gain a thorough understanding of any applicable Minnesota statutes or rules that specify requirements for the NHR process to ensure that the scope and extent of the area reviewed are appropriate for the project. We would appreciate any references to relevant statutes or rules that may guide this process.</p>

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						<p>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. "</p> <p>Requested Action: Submit to MCE and include in next submittal.</p>	
619	14.b	1810		<p>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.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>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).</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>If additional guidance regarding the NHR process is provided, the project team will assess its applicability and integrate it as feasible. At the latest, detailed information will be included in the Environmental Impact Statement (EIS) data submittal, at which point the project's scope and areas of interest will have been defined</p>
620	14.b	1821		<p>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.</p> <p>Requested Action: Identify potential wild rice areas within the Project Area</p>	<p>Comment is noted.</p> <p>See Response to Comment #632.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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621	14.b	1821		<p>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.</p> <p>Requested Action: Address comment. Modify text if needed</p>	<p>Comment is noted.</p> <p>Monitoring would be completed as needed per Minnesota Rules, chapter 7050.0220 subpart.3a.</p>	<p>Follow-up: Please include 10 mg/L wild rice sulfate standard in EAW</p> <p>Requested Action: Edit text to address comment.</p>	<p>Thank you for your follow-up comment. The 10 mg/L sulfate standard for wild rice waters is an important regulatory requirement and will be considered in the project's compliance with Minnesota water quality standards. However, the scoping document is intended to identify key areas for further study, and specific regulatory values such as the wild rice sulfate standard will be fully addressed during the EIS and subsequent permitting processes, as required by Minnesota Rules, chapter 7050.0220, subpart 3a.</p>
622	14.b	1823		<p>Will baseline data collection be included in the EIS? It would be beneficial to include pre-mine wild rice status.</p> <p>Requested Action: Edit EAW, Include analysis in EIS</p>	<p>Comment is noted.</p> <p>Data and analyses collected and conducted in support of the Project would be included with the EIS data submittal.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
623	14.b	1823		<p>Wild rice may also be present in non-public waters. Requires thorough survey potential habitats downstream of project.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
624	14.b	1830		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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627	14.c	1852		Discussion of future climate trends on project impacts does not adequately address uncertainty of climate predictions.  Requested Action: Advisory, Future discussion item in development of Draft Scoping Decision Document	Comment is noted.  Future discussion item, as necessary, in development of DSDD.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
628	14.c	1864		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.  Requested Action: Advisory, 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
629	14.c	1865		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
630	14.c	1867		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
631	14.c	1873		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Thank you for your comment regarding the potential for invasive species colonization, such as cattail invasion, following changes in hydrology and water chemistry related to mining discharge. The comment is noted, and relevant factors like hydrology and geochemistry will be part of the environmental review process. Further discussion may occur if these issues are identified for detailed analysis during the review.</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>Requested Action: Address comment. Modify text as needed</p>	<p>Comment is noted.</p> <p>See Response to Comment #625.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>



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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Thank you for the comment. The text in the EAW, in response to comment 645, has been modified, as follows:</p> <p>EAW October 2023 (as written) "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"</p> <p>EAW December 2024 (as modified) "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. [R2_Cmt_#645] ]"</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Thank you for the suggested language. The text of the EAW has been modified, as follows:</p> <p>EAW October 2023 (as written) "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"</p> <p>EAW December 2024 (as modified) "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. [R2_Cmt_#645] "</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>	<p>Talon acknowledges the importance of identifying undocumented cultural properties and recognizes the historical significance of the area's wetland complex. The comment regarding potential burial sites has been noted, and we understand the concern for the inadvertent discovery of such sites.</p> <p>Talon will include this topic in future discussions and, as necessary, during the development of the Draft Site Development and Design Document (DSDD). While the recommendation to consider LIDAR surveys for the wetland areas is noted, further assessment will be conducted to determine the most appropriate methodologies for evaluating cultural resources in the project area. Talon remains committed to working with the responsible governing unit (RGU) and relevant stakeholders to ensure a thorough evaluation of cultural resources.</p> <p>The following language was added to the EAW to address burial concerns:</p> <p>EAW December 2024 "Additionally, the wetland complex in the Project Area may have been used as burial sites, raising the possibility of inadvertent discoveries. This concern requires evaluation as part of the EIS process. [R2_Cmt_#646]"</p>

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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>	Comment is noted.	<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>	<p>Thank you for your comment. The following language has been added to the EAW:</p> <p>EAW XX2024 "The Project would require a permit from the United States Army Corps of Engineers (USACE), constituting an undertaking subject to Section 106 of the National Historic Preservation Act. As a result, cultural resources investigations, including tribal cultural resources investigation, an archeological reconnaissance, and a historic architectural survey, would be completed prior to construction to determine whether historic properties eligible for the National Register of Historic Places are located within the Project Area. [R2_Cmt_#647]"</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>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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Thank you for your comment. The following language has been added to the EAW:</p> <p>EAW XX2024 "As directed by the USACE, revisiting and re-evaluation of previously recorded architectural resources may occur within the Area of Potential Effect, as defined by the USACE. [R2_Cmt_#650]"</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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, 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.</p> <p>Requested Action: Answer question. Edit text as necessary</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
658	16	1946		<p>A figure/map showing surrounding cover types and locations of residences/other mentioned sites would be useful</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>Comment is noted and will be taken under consideration.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
659	16	1963		<p>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</p> <p>Requested Action: Answer question. Edit text as necessary</p>	<p>Various mitigation measures will be taken to address nighttime noise and light impacts, which will be further evaluated as part of the EIS.</p> <p>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.</p>	<p>Follow-Up: Review of noise and light impacts from proposed project remain a concern. Review of these issues will continue in future submittals.</p> <p>Requested Action: Advisory only; to be discussed in the development of the DSDD.</p>	<p>Thank you for your comment. This is a future discussion item, as necessary, in development of DSDD.</p>

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660	16	1998		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
661	6.b	1999		<p>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.</p> <p>Requested Action: Consider comment and edit document as current information allows. Future 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 at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
662	6.b	1999		<p>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 hours.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
663	17.c	1999		<p>Other point sources a 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.</p> <p>Requested Action: Address comment and update EAW as appropriate.</p>	<p>An inventory of point and mobile sources will be developed, as necessary, as part of the EIS data submittal and air permitting.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
664	23	1999		<p>Underground mobile equipment emissions may be required to be categorized as point or stationary sources by MNR for Air Permitting purposes.</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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	In response to the comment the EAW was edited as follows:  EAW October 2023 (as written) "Carbon dioxide equivalence (CO2e)"  EAW December 2024 (as modified) "Carbon dioxide equivalence (CO2e) are the number of metric tons of CO2 emissions with the equivalent global warming potential as one metric ton of another greenhouse gas [R2_Cmt_#667]"
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.



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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
671	17.a	2007		Will Mercury from the rock formation and peat add mercury to the air in addition to the impact on local waters?  Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	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.	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
672	17.a	2007		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
673	17.a	2017		Elongated mineral particle review will need a thorough evaluation using approved MDH methodologies for air and water analyses.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
674	17.a	2019		Will potential silica release be addressed?  Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	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	Resolved.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
675	17.a	2020		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.  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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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 &gt; 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>	A material characterization program is under way, The Project will have a complete EMP data set to inform the EIS.	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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. Future discussion item in development of Draft Scoping Decision Document.</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>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	The Project will address this question, as necessary, in the EIS.	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	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>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	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>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	The Project will address this question, as necessary, in the EIS.	<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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	The Project will address this question, as necessary, in the EIS. Also see Response to Comment #121.	<p>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Thank you for your comment. A sentence has been added to the appropriate section of the data submittal to outline the monitoring and sampling program associated with the mine ventilation exhaust circuit. The EAW was updated as follows:</p> <p>EAW October 2023 (as written) "Control equipment would include fabric filters or a scrubber for material handling and loadout operations. Water sprays would be used to minimize emissions from underground mining operations. Details will be provided in the EIS."</p> <p>EAW December 2024 (as modified) "This equipment would include bag houses for the material handling and loadout operations (see section 6.21.6), along with wet scrubbers (see section 6.21.8) to reduce emissions from underground mining activities. [R2_Cmt_#169] Additionally, levels of relevant gases in the mine ventilation exhaust circuit would be monitored in real-time, and particulate levels would be regularly sampled in alignment with health and safety standards. Further details on these measures would be provided in the EIS. [R2_Cmt_#106] [R2_Cmt_#122][R2_Cmt_#896] [R2_Cmt_#898]"</p>
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>	<p>Thank you for your comment. The amended design includes two ventilation raises to the east of the Ore Transfer Building, which would serve as intake and exhaust for the underground operations. Updated ventilation details have been provided in response to EAW Question 6 Project Description.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
696	17.a	2063		<p>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.</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>Comment is noted.</p> <p>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.</p>	<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment. Talon acknowledges the clarification regarding Class I areas and has edited the EAW accordingly.</p> <p>EAW October 2023 (as written) "To support EIS development, the Project would conduct a modeling analysis for the Class I areas near the Project Area that may include an initial screening, an increment analysis, and particle transport modeling analysis."</p> <p>EAW December 2024 (as modified) "To support the EIS development, modeling analysis for all federally approved Class I areas within 200 km (Figure 23) of the Project Area will be conducted. This may include an initial screening, a significant impact analysis, and a particle transport modeling analysis to assess potential project impacts on these areas. (R2_Cmt_#696]"</p>
697	17.a	2063		<p>Although Mille Lacs Air is a Federal Class II, 11 MLBS §119 requires treatment of Mille Lacs Air "Pursuant to Class I".</p> <p>Requested Action: Consider comment; edit figure and/or text as warranted.</p>	<p>The Mille Lacs Reservation is not federally recognized by the EPA as a Class 1 area.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
698	17.a	2063		<p>"MPCA Risk Assessment Screening Spreadsheet" should be fully identified as "MPCA Air emissions risk analysis (AERA) Risk Assessment Screening Spreadsheet (RASS)(aq9-22)"</p> <p>Requested Action: address comment. Edit text as necessary</p>	<p>Thank you for your guidance.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.



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704	17.b	2080		<p>What about emissions from possible use of propane or natural gas powered vehicles?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	Off-highway mobile equipment will be evaluated.	<p>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.</p> <p>Requested Action: No action necessary.</p>	<p>Thank you for your comment. The EAW has been updated in section 18.a to include emissions from on-road and non-road mobile equipment, including diesel-, gasoline-, propane-, and natural gas-powered vehicles. This addition addresses the potential greenhouse gas (GHG) emissions from these sources, ensuring a comprehensive review of emissions.</p> <p>EAW October 2023 (as written) "GHG emissions from construction activities would include both on-road and non-road mobile equipment , land use change, and potential electrical consumption. [R2_Cmt_#1225]"</p> <p>EAW December 2024 (as modified) "GHG emissions from construction activities would include both on-road and non-road [R2_Cmt_#1226] mobile equipment (e.g., diesel-, gasoline-, propane-, natural gas-powered) [R2_Cmt_#704], use change, and potential electrical consumption. [R2_Cmt_#1225]"</p>
705	17.c	2092		<p>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.</p> <p>Requested Action: Answer question. Future topic of discussion for treatment of community health issues in development of Draft Scoping Decision Document.</p>	The Project will address this question, as necessary, in the EIS.	<p>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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706	17.c	2094		<p>How would the overburden and construction-related materials piles be kept safe from wind erosion?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	<p>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.</p>	<p>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.</p> <p>Requested Action: No action necessary.</p>	<p>Thank you for your question. Fugitive dust sources during construction are expected to be similar to those during operations. To control these emissions, mitigation measures outlined in the EAW, including dust suppressants, water sprays, and surface maintenance practices, will be applied consistently across both construction and operational phases. The following text was added to the EAW:</p> <p>EAW December 2024 "During construction, sources of fugitive dust are expected to be similar to those encountered during operations, and the same types of mitigation measures, would be applied to control emissions. [R2_Cmt_#706]"</p>
707	17.c	2097		<p>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.</p> <p>Requested Action: Note comment. A Fugitive Dust Control Plan will be presented in the EIS.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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708	17.c	2105		<p>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?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	<p>Required compliance air monitoring procedures will be determined during the permitting process. The Project will meet the Clean Air Act ambient air quality standards.</p>	<p>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).</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for the comment. The EAW has been modified as follows:</p> <p>EAW October 2023 (as written) "The list of emission sources and potential pollutants will be updated as additional facility design is completed. The EIS will calculate emissions for all sources and air pollutants. However, anticipated sources are described further below."</p> <p>EAW December 2024 - (as modified) "Specific air monitoring methods and compliance standards, including particulate control and mitigation measures, would be developed and finalized as part of the EIS and the permitting process. Talon is committed to ensuring that emission sources, including particulate exhaust, meet applicable standards under the Clean Air Act and Minnesota ambient air quality standards as set forth in MN Rule 7009. [R2_Cmt_#708]"</p>
709	17.c	2107		<p>Describe visible emission inspection procedure. Describe specific location, frequency, and method for inspections (example: daily fence line measurements using PM2.5 instrumentation)</p> <p>Requested Action: Note for Fugitive Emissions Plan in EIS</p>	<p>Required compliance air monitoring procedures will be determined during the permitting process. The Project will meet the Clean Air Act ambient air quality standards.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
710	17.c	2109		<p>Describe frequency of dust suppressant application. Describe criteria for use of additional chemical dust suppressants, if needed.</p> <p>Requested Action: Note for Fugitive Emissions Plan in EIS</p>	<p>Specific procedures related to dust suppressants for fugitive emission controls will be addressed in the fugitive dust control plan created for permitting.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
711	6.b	2117		<p>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.</p> <p>Requested Action: Edit document as needed to address comment. Further discussion of issue for treatment in 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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
712	23	2117		<p>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.</p> <p>Requested Action: Answer question.</p>	<p>The Project looks forward to future discussions on this topic and will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
714	18.a	2140	Table 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
715	18.a	2141	Table 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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719	18.b.i	2150		<p>Define feasibility criteria.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>Please provide additional detail or specifics to help clarify the question.</p>	<p>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 considered "feasible" to apply?</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>In context to the use of the term feasible here, it is defined as "Capable of being implemented in a way that aligns with project objectives, without compromising essential operations or safety, and in compliance with regulatory requirements."</p> <p>For clarity purposes the term was removed and additional language was added as described here:</p> <p>EAW October 2023 (as written) "The Project plans to apply appropriate GHG mitigation measures when feasible."</p> <p>EAW December 2024 (as modified) "The Project plans to apply appropriate GHG mitigation measures. However, a measure must be compatible with project operations, ensuring it does not interfere with essential functions or compromise safety. [R2_Cmt_#719]"</p>
720	18.b.i	2150		<p>The EIS should to identify all possible GHG mitigation alternatives (e.g., on-site production of renewable energy).</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
721	18.b.i	2150		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
722	18.b.i	2163		<p>Where would biosolids applications occur and what would the source of biosolids be?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	<p>Biosolids applications has been removed from the list of GHG mitigation measures.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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723	18	2163		<p>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.</p> <p>Requested Action: Respond to comment; edit document as needed.</p>	<p>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.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
724	18.b.i ii	2169		<p>What options are available to further reduce the project-related GHG emissions beyond the Next Energy Act Goals?</p> <p>Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document</p>	<p>The Project will address this question, as necessary, in the EIS.</p>	<p>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.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
725	18.b.i ii	2173		<p>GHG emissions from water treatment should be considered and discussed in this section.</p> <p>Requested Action: Consider comment; edit text as warranted.</p>	<p>The Project will address this question, as necessary, in the EIS.</p>	<p>Resolved.</p> <p>Requested Action: None.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
726	6	2179		<p>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.</p> <p>Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document and noise/vibration impact assessment work plan.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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728	19	2179		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.  Requested Action: Address comment; modify text as warranted.	This topic will be addressed further during the EIS. See Response to Comment #109 for additional information.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
729	19	2179		Are noise impacts to wildlife considered?  Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	This topic will be addressed as necessary during the EIS.	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.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
730	19	2179		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?  Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	This topic will be addressed as necessary during the EIS.	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.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
731	19	2185		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.  Requested Action: Consider comment; edit text as warranted.	The Project looks forward to future discussions on this topic, which would be further addressed as necessary in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD.  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
732	19	2187		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.  Requested Action: Consider comment; edit text as warranted.	This topic will be addressed as necessary during the EIS.	Resolved  Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Thank you for the comment. In light of the modified design the Project is no longer looking to use a TBM. However, regardless of the excavation methodology used, the noise and vibration effects will be considered in the EIS data submittal.</p>
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>	<p>Thank you for the comment. The EAW submitted in June 2023 included a tunnel boring machine (TBM) in the project design for the construction of the dual decline; however, the revised design is now a single decline which may employ a Mobile Tunnel Borer (MTB) and/or traditional Drill and Blast excavation methods.</p> <p>EAW December 2024 "A detailed analysis of potential impacts from vibrations and air blasts produced by the selected method(s) will be provided for the Environmental Impact Statement (EIS). This analysis will consider potential effects on fractures and faults, groundwater inflow, existing drinking water wells, and mine infrastructure. [R2_Cmt_#734] [R2_Cmt_#874]"</p>



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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
738	19	2200		<p>At a minimum there should be daytime and nighttime noise models for construction, operation, and closure.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
739	19	2200		<p>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.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has edited the EAW text as requested.  EAW October 2023 (as written) "...alternative transportation modes are not available."  EAW December 2024 (as modified) "...alternative transportation modes are impracticable. [R2_Cmt_#744]"
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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746	20.a	2212		"Future parking would consist of approximately 160 spaces." So, will the parking lot be surface be permeable or impermeable surface for the bulk stormwater runoff?  Requested Action: Answer question.	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 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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750	21.a	2255		<p>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.</p> <p>Requested Action: Advisory only; the issue will be explored over the development of the scoping EAW and 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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
751	21.a	2258		<p>The EIS scope may include discussion of the surrounding community, its sociodemographic, environmental justice, and human health issues.</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>Resolved.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
752	21.a	2266		<p>RGU notes consideration may be given to adding tribal lands and ceded territories.</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>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
753	21.b	2271		<p>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 extend into neighboring lands over extended timeframes.</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>Resolved at this stage. To be discussed in development of the SEAW/DSDD.</p> <p>Requested Action: None.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
754	21.b	2274		<p>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.</p> <p>Requested Action: Advisory only; future discussion item as potential impacts are better understood in development of scoping documents.</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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
755	21.b	2279		<p>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.</p> <p>Requested Action: Advisory only; future discussion item as potential impacts are better understood in development of scoping documents.</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>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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!	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Thank you for the suggestion; however, the NI 43-101 document was not used in the development of the EAW and therefore is not included.
760	23	2306		Should add the following reference Current Records -- Map -- <a href="https://osaportal.gisdata.mn.gov/CurrentRecordsMap">https://osaportal.gisdata.mn.gov/CurrentRecordsMap</a> -- 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
761	23	2306		Should add the following reference Tribal Directory Assessment Tool -- <a href="https://egis.hud.gov/tadat/">https://egis.hud.gov/tdat/</a> -- 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
762	23	2306		Should add the following reference -- National Register of Historic Places -- Database Research -- <a href="https://www.nps.gov/subjects/nationalregister/database-research.htm">https://www.nps.gov/subjects/nationalregister/database-research.htm</a> -- 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Thank you for the comment. The Environmental Assessment Worksheet (EAW) focuses on key emissions sources such as stationary and mobile sources, along with dust and odor, to provide an initial overview of the Project's potential air quality impacts. While explosives are not typically categorized as stationary or mobile sources, the emissions they generate will be vented through the Mine Exhaust Stacks, and as such, can be assessed similarly to stationary sources.</p> <p>Regarding anthropogenic and biogenic emissions, Talon acknowledges the comment and will ensure that all relevant emissions sources are considered as we move forward with the development of the Environmental Impact Statement (EIS) data submittal. The EIS will provide a detailed evaluation of the Project's emissions, including the identification of pollutants and the methods used to assess air quality impacts.</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>	<p>Thank you for the comment. Talon will update the document language as requested to clarify that mobile source emissions include those from trucks, trains, and equipment.</p> <p>EAW October 2023 (as written) "mobile source emissions;"</p> <p>EAW December 2024 (as modified) "mobile source emissions (e.g., trucks, trains, and equipment); [R2_Cmt_#770]"</p>

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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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</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>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>



**Round 2 Comment Responses Table**

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
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.	Thank you for your comment. The EAW has been update. The HUC8 value has been added for clarity.
774	5	49	Table 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.	Thank you for your comment. The EAW has been updated to reflect latitude and longitude coordinates to the 5th decimal place for consistency in precision, as requested.
775	5	49	Table 2	List the Tax Parcel Numbers in numeric order.  Requested Action: Modify text to address comment.	Thank you for your comment. The EAW has been update. The Tax Parcel Numbers have been reordered in numeric sequence for clarity.
776	5	188		Add "MnDOT Minnesota Department of Transportation"  Requested Action: Modify text to address comment.	Thank you for your comment. The acronym/abbreviations lists has been updated to include "MnDOT Minnesota Department of Transportation."
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.	Thank you for the inquiry. The area extent of the underground workings is defined in the EAW data submittal as the Underground Boundary Area, see the Project Overview. Further information regarding the depth of the mine workings has been added to Project Magnitude table under question 6.
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.	Thank you for your question. While evaluating land use impacts is part of the environmental review, detailed acreages of roadway and railway used during construction and operations fall outside the typical scope of the EAW. Any relevant land use impacts will be considered as part of the EIS, and further specifics may be addressed during permitting if needed. Additionally, we kindly request any examples of how this type of calculation has been conducted for environmental reviews in the past to ensure we align with any necessary expectations for the EIS.
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.	REVIEW UPDATED EAW A clarification the waste rock and overburden stockpiles were included in the in the total acreage of new plus existing acreage (83.0 acres), that does include the 77.6 acres.  The amended project design no longer includes the surface stockpiles of overburden or waste rock.

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
780	6.b	287		The acreage of the proposed site may be insufficient to store mine wastes and contact water.  Requested Action: Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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	Thank you for the comment. Talon acknowledges potential peat soil disruption, and the EIS process might explore transport alternatives, including roadway options.
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.	Thank you for your question. To clarify, all equipment for both the construction and production phases would be accommodated and operated within the project site. During the construction of the Portal and SEM portions of the Decline Ramp, overburden material would be hauled to the surface, offloaded, and loaded onto tipper trucks using front-end loaders, with approximately 2 to 3 truckloads transported off-site daily. During construction, Rock from the Bedrock section the Decline Ramp would also be brought to the surface and offloaded inside the enclosed Ore Transfer Building, where it would be loaded onto rail cars by front-end loaders for transport to North Dakota.
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.	Thank you for the question. The acres of potential "temporary" use is specifically associated with the construction phases of the project. Evaluations of environmental impacts for construction will be conducted as part of the Environmental Impact Statement (EIS) process.
785	6.b	312	Table 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.	Talon acknowledges this question on "temporary" use. In this context, "temporary" applies solely to the construction phase. The 159.3 acres would provide a buffer for flexibility in project layout as detailed engineering advances, minimizing the need for boundary adjustments later. Actual disturbance in this area may not occur.

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786	6.b	312		<p>The term "temporary" for "construction laydown and other potential temporary uses" is not defined. Please specify the timing meant by "temporary" in this context.</p> <p>Requested Action: Modify text for clarity.</p>	<p>Thank you for comment. As used here the term 'temporary' was limited to the period of construction. When compared to operational activities, construction activities are viewed as temporary.</p> <p>Both of the these uses were defined in text as 'temporarily utilized during construction.' "Areas that may be temporarily utilized during construction for staging of equipment and materials but would not result in a long-term developed surface after construction is complete." and "Areas that may be temporarily utilized during construction for a variety of purposes including gaining temporary access to various areas of the site, maneuvering of equipment, placement of construction cranes, conducting earthwork activities, placement of aerial or underground utility lines, etc. "</p>
787	6.b	315	Table 1	<p>Graphic 1 has facilities but labels only site features. Label all facilities on the site shown in the graphic.</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for the question concerning the labeling of Graphic 1. This graphic was not intended for showing all of the surface facilities. The purpose of the figure was to show the general relationship of the underground to the surface.</p>
788	6.b	315	Table 1	<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment. The amended project design has eliminated the topsoil and backfill stockpiles adjacent to the railway. As a result, considerations regarding the scale and distances between these stockpiles and the rail are no longer applicable.</p>
789	6.b	320	Table 2	<p>Graphic 2 has no labels or scale. Add them to the graphic.</p> <p>Requested Action: Modify graphic to address comment.</p>	<p>Thank you for the input. Graphic 6-2 is intended as a visual overview of the surface facilities, while Figure 3 provides the detailed labels and scale for reference.</p>
790	6.b	324		<p>Will the transported ore also contain sulfur?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your question. Yes, the transported ore will contain sulfur, as it is a component naturally present in the sulfide mineralization associated with the ore body.</p>
791	6.b	324		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Mine plan has been updated. At steady-state, the mine would produce roughly 1.1 Million short tons /year of ore. In total, the Mine would produce approximately 8.2 Million short tons of ore and 1.3 Million short tons of waste roc, approximately 9.5 Million tons.</p>
792	6.b	324		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>This comment is noted. The Project description focuses on summarizing the purpose, infrastructure, and environmental considerations related to ore extraction from the Tamarack Intrusive Complex near Tamarack, MN.</p>

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793	6.b	335		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment. The updated design eliminates the separate building. Waste rock will be crushed on-site indoors with ventilation exhaust controls to manage emissions, and aggregate may also be crushed as needed.</p>
794	6.b	335		<p>What volume and class are the rock being crushed?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your question regarding the volume and classification of rock to be crushed. Throughout the life of the mine, both waste rock and ore will undergo crushing. On average, approximately 540 tons per day (tpd) of waste rock and 2,230 tpd of ore are expected to be produced. Waste rock production is anticipated to be highest during the initial phases of mine startup, while ore output would be ramping up as mining operations stabilize. Detailed information on production specifics and crushing will be further evaluated and documented in the Environmental Impact Statement (EIS) data submittal.</p>
795	6.b	336		<p>Revised EAW excludes Cemented Backfill Plant. How will crushed materials be used as backfill? What cement plant would be used?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>To address any potential confusion, we would like to clarify the current project design. In the revised version of the EAW (October 2023), the Cemented Backfill Plant was omitted from the list of facilities, although it was still mentioned throughout the text. In the latest project update (EAW December 2024), the process for creating Cemented Rock Fill (CRF) has been integrated into the main building instead of being a separate facility. This design ensures that crushed materials, such as waste rock, are used to produce CRF entirely within the main building, optimizing space and streamlining operational efficiency.</p>
796	6.b	337		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>The revised EAW (October 2023) continued to describe the 'ore storage and rail loadout facility' as enclosed. "Inside the ore storage and rail loadout facility, the railcar cover would be removed, then a front-end loader or conveyor would load the ore into the railcar. The cover would be replaced before the railcar exits the ore storage and rail loadout facility." Furthermore, storing and loading ore within an enclosed building remains unchanged in the revised plan.</p> <p>The Ore Transfer Building is being designed to hold 4,400 tons (4,000 tonnes) of material for shipping to processing facility.</p>
797	6.b	338		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>To clarify any potential confusion, the amended design has led to adjustments in the names and terms used throughout the EAW to ensure consistency with updated drawings and descriptions. The language in the document now reflects these changes, aligning terms like "Ore storage building" and "Ore storage and railcar loadout" for coherence across all sections.</p>
798	6.b	339		<p>The revised EAW removes the railway yard for railcar storage. Would there be no storage of railcars?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>The EAW (October 2023) did not remove the railway yard for railcar storage. In Section 6.b. under heading Ore Transport, it is stated that "Empty and loaded railcars would be stored at the railway yard adjacent to the ore storage and loadout facility". The revised design (EAW December 2024) also includes a railway yard as described.</p>

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799	6.b	345		<p>"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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Talon acknowledges the application of Minnesota Rules 6132.2400 and 6132.2200 regarding the storage and management of waste rock and reactive mine waste. In the EAW, the term 'Backfill Materials Stockpile' was used to describe a facility that managed both waste rock and aggregate with appropriate management measures for stockpiles containing reactive waste rock under Minnesota non-ferrous mining regulations. Talon did not intend for the terminology to imply a deviation from required waste rock handling standards.</p> <p>In the revised design (EAW December 2024), however, the 'Backfill Materials Stockpile' that was to contain waste rock has been eliminated and replaced with an imported aggregate buffer.</p>
800	6.b	347		<p>Facility elements lists "Topsoil stockpile" but the EAW has no description for it. Add description.</p> <p>Requested Action: Edit text as requested.</p>	<p>Thank you for your comment. The design has been updated, and the topsoil stockpile has been eliminated. This change will be reflected in the revised EAW to ensure consistency and accuracy in the project description</p>
801	6.b	361		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>This comment is noted. The project description focuses on summarizing the purpose, infrastructure, and environmental considerations related to ore extraction from the Tamarack Intrusive Complex near Tamarack, MN.</p>
802	6.b	361		<p>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)?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for the comment. Testing and studies relevant to the environmental review process will be discussed in consultation with the Responsible Governmental Unit (RGU) as part of the Environmental Impact Statement (EIS) scoping and development phases.</p>
803	6.b	363		<p>Explain what "market conditions" would determine actual mine life. Where is documentation of operating costs and market pricing to support economic feasibility of proposal?</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>This comment is noted. The project description focuses on summarizing the purpose, infrastructure, and environmental considerations related to ore extraction from the Tamarack Intrusive Complex near Tamarack, MN.</p>
804	6.b	366		<p>Has the proposer been using the "septic systems and/or leach fields" that will be removed in construction?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Yes, the proposer has been using the existing septic systems and/or leach fields that will be removed during construction.</p>

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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.	Thank you for your comment. Vegetation removal will occur only as needed for the construction of project facilities, including areas for surface infrastructure and access routes. Where feasible, existing vegetation will be preserved to reduce environmental impacts. Vegetation from the removal of wetlands affected by construction will not be stored. Details on specific vegetation types and the extent of impacts will be analyzed in the EIS.
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.	Talon has reviewed this comment in light of the amended design and does not consider the water generated from excavating through the overburden to be contact water. The EIS data submittal, however, would provide additional analysis regarding the level of treatment required for discharge. [R2_Cmt_#806].
807	6.b	372		What volume of water and parameters requiring treatment would result from tunneling?  Requested Action: Answer question; modify text as warranted.	Please see the response to comment number 806.
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.	Thank you for the comment. The Project description outlines considerations for water flow along the upland that will be constructed for the rail corridor, noting that the upland may be constructed with materials or features allowing water to move across or beneath it. These design elements are intended to support natural water flow through the area and effectively manage potential hydrological impacts.
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.	Thank you for your comment. The estimated volumes of peat and fill material, along with other relevant project metrics, are provided in the project magnitude table included in the EAW data submittal. This table has been updated to reflect the amended design.
810	6.b	380		Where will project require pilings due to "areas of deeper peat"?  Requested Action: Answer question; modify text as warranted.	Thank you for the comment. Areas with deeper peat that may require pilings are identified in preliminary assessments, and specific locations will be evaluated and detailed in the EIS data submittal.

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811	6.b	383		<p>Change "may" to "would" for consistency.</p> <p>Requested Action: Edit text as requested.</p>	<p>The text of the EAW has been edited as requested.</p> <p>EAW October 2023 "The railway spur may 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. [R1_Cmt_#52] [R1_Cmt_#56]"</p> <p>EAW December 2024 (as modified) "Conversion of the wetlands to uplands for the railway spur would use appropriate materials (e.g. coarse rock) or features (e.g. culverts) to enable water to flow across and/or under the developed surface to facilitate water movement between each side of it and address the potential for differences in water levels and/or other hydrological impacts. [R1_Cmt_#52] [R1_Cmt_#56] [R1_Cmt_#585] [R2_Cmt_#808] [R2_Cmt_#811] [R2_Cmt_#812]."</p>
812	6.b	383		<p>Explain how railway features can be constructed to enable water flow.</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your question. The conversion of wetlands to uplands for the railway spur would be designed to facilitate water flow by incorporating culverts, drainage channels, and permeable sections that allow for unimpeded movement of surface and subsurface water. These design elements would help maintain natural hydrological patterns and reduce potential impacts on water flow around the railway. Specific details on how these features will be constructed for the project will be addressed during the EIS process.</p>
813	6.b	383		<p>How many acres of wetlands/peat will be excavated or impacted due to railway spur construction?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>The construction of the railway spur will disturb about 15 acres of wetlands. The details will be provided in the EIS data submittal.</p>
814	6.b	383		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for the advisory comment. Talon will consider a hydrologic analysis in the EIS to assess potential changes in water flow across the rail spur, including the potential ponding on the up-gradient side and drying on the down-gradient side. The EIS will evaluate these aspects to support an informed understanding of hydrological impacts.</p>
815	6.b	388		<p>Evaluate sufficiency of breathable air for workers. Will particulates and dust be released from portals as well as from "stacks"?</p> <p>Requested Action: Answer question; modify text as warranted. Potential Discussion item in development of the Draft Scoping Decision Document</p>	<p>Talon is committed to ensuring that breathable air within the mine meets all regulatory standards necessary for worker safety. The ventilation system will be designed and maintained to comply with Mine Safety and Health Administration (MSHA) requirements, which set strict limits on airborne particulates and contaminants.</p> <p>Regarding air emissions, the primary exhaust point for the mine would be a single, engineered stack. This exhaust would be built to manage and filter air emissions, directing exhaust through a controlled outlet to minimize potential impacts.</p>

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816	6.b	394		<p>Photo of portal from Eagle Mine. Does not seem to reflect tunnel boring machine (TBM) construction. Replace image with one that reflects TBM.</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for the comment. The photo of the Eagle Mine portal is similar to the final portal structure for the Tamarack Mining Project proposed (EAW October 2023). However, in the revised EAW (EAW December 2024), the portal structure has been updated to terminate within the Ore Transfer Building rather than outside and the graphic has been updated to match.</p>
817	6.b	397		<p>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).</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your question. The amended project design has eliminated the TBM, making this specific comparison no longer applicable.</p>
818	6.b	397		<p>What is depth of mine workings?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>The maximum depth of the mine workings would be 2,0000 ft (610 m). Additional information has been added to Project Magnitude table in section 6.</p>
819	6.b	397		<p>Where are the ventilation exhaust drifts in relations to the TBM loop?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your question. The amended project design has eliminated the TBM loop, which was serving as the ventilation intake and the exhaust. With the modified design two raised shafts would intersect with the underground decline tunnels to provide ventilation.</p>
820	6.b	397		<p>Where is location on map of wetlands and other features of proposed tunnel and blasting?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for the comment. Could you clarify if you are requesting information on wetlands and features near the proposed tunnel and blasting areas?</p>
821	6.b	399		<p>Portal tunnel would extend to top of ore body. Clarify depth, locations of shallowest blasting.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for you comment. With the modified design the shallowest depth of drill and blast would be the bedrock contact at approximately 100 ft (30.5 m) below surface.</p>
822	6.b	409		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your question. The amended project design has eliminated the TBM, making this specific comparison no longer applicable.</p>
823	6.b	417		<p>Explain excavation support system, including nature of overburden, sediments, and rock and nature of supports. Provide amount and method of calculation for groundwater infiltration.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your question. Details about the soil improvement and Sequential Excavation Method (SEM), and inflow management can be found in sections 6.5.1 to 6.5.4. Details regarding the amount and method of calculation for groundwater infiltration will be provided as part of the Environmental Impact Statement (EIS) data submittal.</p>



Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comparison no longer applicable.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comparison no longer applicable.
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.	Thank you for your question. Talon has reviewed this comment in light of the amended design. The Bedrock Section of the Decline Ramp would no longer use precast concrete rings as the liner; instead, the amended design incorporates a shotcrete liner, which would be left in place upon mine closure.
827	6.b	423	Table 5	Provide meaningful scale to Graphic 5. Without a scale, this graphic is not meaningful.  Requested Action: Modify graphic to address comment.	Thank you for your comment. The graphic has been updated to reflect the revised project design.
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	Thank you for your comment. Since the project is now considering drill and blast or a Mobile Tunnel Borer (MTB) to construct the Bedrock Section of the Decline Ramp, this image has been removed from the draft text.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comparison no longer applicable.
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.	Thank you for your comment. Since the project is now considering drill and blast or a Mobile Tunnel Borer (MTB) to construct the Bedrock Section of the Decline Ramp, this image has been removed from the draft text.
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.	Thank you for your comment. The amended project design has eliminated the use of overburden stockpiles, making the inquiry about their lining and duration no longer applicable. Additionally, the current plan no longer assumes or incorporates the use of quaternary deposits for construction purposes.

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832	6.b	463		<p>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.</p> <p>Requested Action: Advisory.</p>	<p>The amended design no longer includes surface overburden stockpiles, which makes detailed evaluations of their management, such as volume, composition, and reuse, unnecessary. However, any related considerations will be addressed in the EIS to ensure comprehensive project assessment.</p>
833	6.b	465		<p>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.</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for your comment. Under Minnesota Rule 6132.2200, waste rock may be classified as reactive mine waste if it is shown through characterization studies to release substances that adversely impact natural resources. In the amended Project design, surface storage of waste rock has been eliminated, with any necessary management taking place within enclosed facilities to control reactivity. Details on waste rock volume, chemical composition, and management timing will be addressed in the EIS.</p>
834	6.b	472		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>
835	6.b	472		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>
836	6.b	472		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Please see the response to comment number 806.</p>
837	6.b	474		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your comment. Due to the phased-out of the Tunnel Boring Machine (TBM), this question is no longer directly applicable. However, details regarding water use for excavation activities will be provided in the project description within the amended EAW data submittal</p> <p>Please see the response to comment number 841.</p>

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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.	Thank you for your comment. This question is no longer applicable due to changes in the project design.
839	6.b	475		What is the chemical characteristic of the water captured and reused?  Requested Action: Answer question; modify text as warranted.	Thank you for your comment. The chemical characteristics of water captured and reused in the project will be addressed in the EIS data submission, where the Project will provide details on the composition and treatment considerations for reused water throughout various project stages.
840	6.b	475		What is the chemical characteristic of the water not captured and reused?  Requested Action: Answer question; modify text as warranted.	Please see the response to comment number 839.
841	6.b	475		What is the source of the TBM generated water?  Requested Action: Answer question; modify text as warranted.	Thank you for your comment. Water generated during the excavation of the Bedrock section of the Decline Ramp would primarily originate from groundwater inflow and, as needed, from an on-site well to support excavation activities. This water would be captured and, where feasible, recycled for continued use.
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.	To clarify any potential confusion, the amended design has led to adjustments in the names and terms used throughout the EAW to ensure consistency with updated drawings and descriptions. The language in the document now reflects these changes, aligning terms like "Ore storage building" and "Ore storage and railcar loadout" for coherence across all sections.
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.	Thank you for your question. As the project no longer intends to use a TBM, this question is no longer relevant.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comparison no longer applicable.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.

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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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.
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.	Shallowest depth of drill and blast would be the bedrock contact at approximately 100 ft (30.5 m) below surface.  In addition, the revised EAW states that explosive may be occasionally required during excavation of Decline Ramp. "If large boulders are encountered that could not be safely removed using a front-end loader or fractured using a roadheader, packaged explosives may be used to fragment these larger rocks. [R2_CMT_#848] [R2_Cmt_#48] "
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.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.
851	6.b	496		Is there exposure if the TBM stalls or fails to penetrate rock?  Requested Action: Answer question; modify text as warranted.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.

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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.	Thank you for your comment. With the project's move away from using a Tunnel Boring Machine (TBM), this comment is no longer applicable to the updated design. Talon remains committed to supporting Minnesota's PFAS Blueprint and will work with the state to evaluate products used onsite. As engineering details develop, products will be assessed for toxicity and environmental impact, aligning with efforts to minimize PFAS use in industrial application.
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.	Please see the response to comment number 853.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.
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.	Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.
858	6.b	513		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.	Thank you for your comment. Future discussion item, as necessary, in 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.	The extent of the underground mine is shown on Graphic 6-1 Co-located Surface Facilities and Underground Facilities. The vertical extent of the mine are summarized in Table Project Magnitude.

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860	6.b	514		<p>What vehicles and fuels are used for each stage of the mining cycle?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for the comment. All primary mining equipment used underground would operate on diesel fuel, as gasoline-powered vehicles are not permitted in underground operations under MSHA regulations. This fleet would include various types of vehicles and equipment specifically designed for each stage of the mining cycle. For drilling, loading, and blasting activities, equipment such as jumbo drills, production drills, emulsion loaders, and personnel carriers would be utilized. Following blasts, ventilation equipment would be employed to clear the area of fumes, allowing loaders (LHDs) and haul trucks to manage the removal of dislodged material.</p>
861	6.b	518		<p>Which, if any of the activities are automated (removing dislodged material, scaling, bolting, surveying) and which are not?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for the comment regarding the use of automation in mining processes. We noticed that the term automated was used in your inquiry. For clarity and accuracy, could you provide additional context or specify your understanding of automation as it applies here?</p> <p>While many mining processes are indeed automated—such as certain material handling systems or bolting rigs that follow pre-programmed routines—others may involve manual operation or mechanized equipment that is not truly automated. For instance, a truck operated manually or semi-manually is not a piece of automation, even if it uses advanced features like GPS or telemetry.</p> <p>Understanding whether the comment is focused on pre-programmed automated systems or general mechanized processes would help us respond more effectively regarding the level of automation applied to tasks such as removing dislodged material, scaling, bolting, and surveying.</p> <p>We appreciate your input and look forward to your clarification.</p>
862	6.b	518		<p>Do the groundwater conditions under Tamarack include water under pressure?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for the question. The groundwater system underlying the Project Area includes unconfined and confined systems. Unconfined systems are typically proximal to the surface and the water table is at atmospheric pressure. As the depth increases, and the geologic layering includes strata with varying permeabilities, typical of many sites, confined groundwater conditions are encountered. In confined systems, the groundwater is under pressure and once encountered during drilling for example, the water level will rise to above the top of the more permeable unit within which the water was encountered. The elevation that the pressurized aquifer pushes water up a well is termed the piezometric level (synonymous with potentiometric level). The preliminary indications are that the confined aquifers underlying the Project Area have piezometric levels that are below ground surface that is consistent with the low topographic relief in the area.</p>
863	6.b	523		<p>Should groundwater conditions be detected after probe holes are drilled, what will be the procedure used to contain or remove the groundwater?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Should groundwater conditions be detected after probe holes are drilled, detailed procedures for containing or removing groundwater will be outlined in the Environmental Impact Statement (EIS) and in any necessary permitting documentation.</p>

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864	6.b	523		Revised EAW should provide information on quantity, vibrations, chemical releases associated with ANFO.  Requested Action: Modify text to address comment.	Thank you for your comment. Detailed information on the quantity, vibrations, and potential chemical releases associated with ANFO use will be thoroughly addressed in the Environmental Impact Statement (EIS) and during the permitting process as necessary.
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.	Thank you for question. For clarification, there will be no blasting conducted while personnel are present in the underground. The EAW outlines that blasting would typically occur during shift changes when personnel are removed from the mine, with enhanced safety protocols referenced for any potential 'on-shift' blasting scenarios. This ensures that all blasting operations are conducted in line with safety practices that prioritize the well-being of all personnel.
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.	Thank you for your comments. The Environmental Impact Statement (EIS) will include a comprehensive assessment of the collection, treatment, and monitoring of dust, gases, and particulates, addressing potential health impacts. This analysis will outline the expected levels of suspended dust and particulates that may be released and describe the control measures planned to comply with air quality standards.
867	6.b	532		What amount of suspended dust and particulates would be released?  Requested Action: Answer question; modify text as warranted.	Please see the response to comment number 866.
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.	Please see the response to comment number 866.
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	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
871	6.b	551		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.  Requested Action: Consider comment; modify text as warranted.	The waste rock is included in the material characterization program, which evaluates the geochemical properties to assess potential reactivity. In alignment with the Project's amended design, no stockpiles of waste rock will be stored on the surface, eliminating the need for surface management of reactive mine waste. Detailed results from the material characterization program will be provided in the Environmental Impact Statement (EIS) data submittal.

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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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</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>	<p>Please see the response to comment number 777.</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>	<p>Thank you for your comment. The requested detailed information on faults, fractures, known areas of high inflow, and corresponding maps with vertical and horizontal axes, along with inflow quantification, will be provided in the data submittal for the EIS. This ensures comprehensive evaluation and supports informed decision-making during the environmental review process.</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>	<p>Drift-and-fill mining is a selective mining method. While a standard mining profile serves as the basis for development through ore, the exact dimensions of the heading would sometimes be adjusted to maximize ore extraction and minimize dilution. This is especially common along the ore/waste boundary, where the floor or walls may be angled. In certain instances, the operator may alter the shape of the cut to better align with the orientation of the orebody.</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>	<p>Thank you for the comment. The following language has been added to the EAW for clarification:</p> <p>EAW December 2024  "Drift-and-fill development would be driven in a square profile (drift) up to 22 ft (6.7 m) wide and from 13-18 ft (4.0-5.5 m) high, using temporary support (friction bolts and screen). [R2_Cmt_#125] [R2_Cmt_#876]"</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>	<p>Thank you for your question. The mine plan does not distinguish between ore and co-mingled dilution. Both the ore and any co-mingled dilution are classified together as ore, and they will be transported as a combined total for processing.</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>	<p>Thank you for your comment. The graphic titled 'Simplified Illustration of Underground Mining Method' was included for educational purposes to provide a general overview and was not intended to represent the detailed mine plan. The EIS data submittal will include more detailed and accurate representations of the mine and backfill plan to ensure clarity and precision.</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 thee an applicable far extent?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your comment. The term 'far extent of the ore is reached' refers specifically to the area currently being mined within the Tamarack Mining Project and does not imply the entire scale of the Tamarack Intrusive Complex. This terminology is used to describe the limits of mining within the defined stope or heading.</p>



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880	6.b	601		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for the comment. Could you clarify the specific concerns regarding sulfur interaction with the creation of Cemented Rockfill, its handling at the backfill plant, or its transportation to underground mine cavities? Additional detail would help ensure a thorough response.</p>
881	6.b	601		<p>To what extent will the CRF and rocks used for backfill contain sulfur?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your question. The sulfur content in the Cemented Rock Fill (CRF) and rocks used for backfill will be determined through material characterization studies. These studies will establish criteria to ensure that materials used in backfill align with environmental and safety standards.</p>
882	6.b	601		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment regarding the mapping and timing of backfilling depleted ore extraction drifts. Talon acknowledges that this information will be needed, but to ensure comprehensive and non-duplicative analysis, the assessment of this backfilling process should be appropriately addressed within the Permit to Mine, as per Minnesota Rule 6132. This approach allows for alignment with regulatory requirements and the efficient presentation of data at the final stages, helping meet the state's objectives of reducing redundancy.</p>
883	6.b	601		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Yes, the project will include a cemented backfill process. However, references to a standalone 'cement backfill plant' have been revised. The process for creating Cemented Rock Fill (CRF) is now incorporated within the main building, known as the Ore Transfer Building, rather than a separate facility.</p>
884	6.b	602		<p>Describe the process used to create Cemented Rockfill on the surface, the amount of water it requires, and the source of that water.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for this question. The following statements in the edited EAW describe the process used to create CRF:</p> <p>EAW December 2024  "The CRF recipe would be composed of a binder, such as cement, crushed rock/gravel and add-mixtures needed to help set the concrete (which may include stabilizers, retardants or accelerants). Add mixtures may be required depending on factors that may include, time from the batch plant to placement, recipe and climate. Varying proportions of binder would be added depending on the strength requirement of the area to be backfilled. Typical binder additions would be in the range of 4% to 10% by weight. Final addition rates would be determined during operation based on onsite strength tests. No tailings would be used as backfill during mine operations. [R1_Cmt_#153] [R2_Cmt_#149] [R2_Cmt_#215] [R2_Cmt_#886]"</p> <p>Water proportions would range from 2% to 5% of the CRF volume. Water for CRF production would typically be sourced from the Contact Water Treatment Plant, though additional water could sometimes be sourced from a well. The water quality requirements for CRF production specify no organic material, a pH greater than 4, sulfate content below 2,000 mg/L, and chloride levels below 4,500 mg/L. [R2_Cmt_#884]"</p>

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885	6.b	606		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment. The updated EAW has incorporated details addressing your concerns. The waste rock will be crushed within the Ore Transfer Building, where it will be combined with cement to create Cemented Rock Fill (CRF). The chemical characterization of these materials is currently considered as part of the material characterization program overseen by the Lands and Minerals team at the Minnesota Department of Natural Resources (DNR).</p>
886	6.b	606		<p>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?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>The backfill strength requirements are based on preliminary empirical strength modeling and benchmarking against similar operations. Further strength modeling will be completed in future studies. The key criteria used to assess backfill strength, and therefore the necessary recipe to achieve that strength, include:</p> <p>The material must be self-supporting in vertical exposures. The backfill must withstand bearing pressures from equipment operating on it to prevent liquefaction. An estimation of backfill and host rock displacement, evaluated through numerical modeling. A design that minimizes dilution, taking into account blast design and backfill durability.</p> <p>The industry standard for assessing preliminary strength requirements is the Simplified Mitchell Backfill Stability Curve, applied at a strike length of 35 meters. Initial testing has been completed, primarily to evaluate geochemical properties; however, a comprehensive testing program will be conducted.</p>
887	6.b	620		<p>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?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Depending on stability and mining requirements, the mine design aims to minimize the use of pillars. Where necessary, faults and fractures will be grouted to manage groundwater inflows or improve geotechnical stability.</p>
888	6.b	622		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment. The Environmental Impact Statement (EIS) will include a groundwater model that evaluates potential water level impacts, including the estimated area in which measurable changes in water levels may occur.</p>
889	6.b	625		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the question. The project has modeled an expected no deflection at the surface, with subsidence potential estimated at a maximum of 0.2 inches. This aligns with Minnesota Rule 6132.3000, which outlines subsidence requirements that focus on minimizing and managing subsidence impacts. Given this expected stability, additional actions such as ground surveys, contouring, or filling would only be necessary if any observable subsidence posed a genuine concern for public health, safety, or natural resources</p>
890	6.b	625		<p>How will groundwater and surface water levels be affected by the 0.2 inch deflection in surface subsidence of the 100 foot of overburden?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Please see the response to comment number 809.</p>

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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>	<p>Please see the response to comment number 889.</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>	<p>Thank you for your question. The EAW draft has been updated with the following additional text:</p> <p>EAW December 2024 "Current modeling indicates that the CGO East and West zones have sufficient structural integrity that backfill would not always be required. Similarly, the MSU, SMSU and 138 zones would require some stopes to be backfilled, however, there would be opportunities in the secondary stopes to either partially fill or use uncemented rockfill given the sufficient structural integrity of this area. [R2_Cmt_#892]"</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>	<p>Thank you for this comment. The EAW draft has been edited to clarify this question:</p> <p>EAW December 2024 "Contact water from the underground mine would be collected at underground settling sumps where initial solids removal would take place. Overflow water from these sumps would be routed, to one of three pumping stations. Each of these pumping stations would include a secondary settling sump that would allow water to decant through a filter cloth prior to being pumped up the ramp to the Contact Water Treatment Plant on surface. Fines that accumulate in the underground settling sumps would typically be silt-sized particles consisting of varying portions of eroded roadbed material, drill cuttings from ore and waste rock, blasting fines from ore and waste rock, and shotcrete/cement fines. Fines would be transported from the underground settling sumps to the rail loading buffer area for transportation to the concentrator. [R2_Cmt_#203] [R2_Cmt_#893] [R2_Cmt_#927] [R2_Cmt_#936]"</p> <p>As the fines would be from waste rock and ore extraction activities, they will have similar chemical parameters.</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>	<p>Thank you for your question. A materials characterization program is in progress to define the reactivity of waste rock disturbed during mining and beneficiation. Chemical stabilization methods may be employed if warranted after being carefully studied in concert with the materials characterization program.</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>	<p>Thank you for your comment. The EAW states that propane heaters will be used to heat intake air going into the underground, and the impacts of this will be analyzed in the EIS. On the surface, portions of the Ore Transfer Building will be heated.</p>

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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>	<p>Thank you for your comment. The geochemical and mineralogical composition of dust and particulates, as well as estimated volume levels during construction, operation, and closure activities, will be analyzed and detailed in the Environmental Impact Statement (EIS).</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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</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>	<p>Thank you for your question. The levels of suspended dust and particulates remaining after filtration and scrubbing will be analyzed and detailed in the Environmental Impact Statement (EIS).</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>	<p>Thank you for your comment. Future discussion item, as necessary, in 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>	<p>Thank you for your question. Explosives stored underground will comply with MSHA regulations outlined in 30 CFR Part 57, which govern the storage and handling of explosives in underground mines. These regulations ensure secure containment in approved magazines, designed to prevent unauthorized access and environmental impacts. Protective measures such as ventilation and safety protocols will be in place to safeguard workers and maintain safe handling practices. In addition, individuals must possess Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE) clearance in order to have access to blasting related materials.</p>
901	6.b	655		<p>Have any mesocosm tests reflecting ecosystem effects been designed or implemented?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Please see the response to comment number 802.</p>
902	6.b	655		<p>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?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>The materials characterization program has been carefully designed in concert with the MNDNR LAM to ensure that all pertinent materials are tested using ASTM and/or ISO standard methods that meet defined requirements for the permit to mine application. Details regarding proposed work are agreed to prior to commencement of testing. Results are shared with the MNDNR LAM team in a timely manner after thorough data validation. The Materials Characterization Workplan and Report will be part of public record.</p>

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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.	Thank you for your question. The amended project design no longer includes surface stockpiling or storage of overburden. Therefore, concerns regarding sulfur content in surface-stored overburden are no longer applicable.
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.	Thank you for the comment; however, the updated project design no longer includes an overburden storage area, making this inquiry no longer applicable.
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.	Thank you for your question. The amended project design has eliminated surface stockpiling of overburden, so potential impacts of rainfall on such stockpiles and any related surface or groundwater concerns are no longer applicable.
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.	Thank you for your question. The amended project design no longer includes the surface storage of overburden, making the inquiry about liners and the chemical composition of overburden dust no longer applicable.
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.	Thank you for your question. The amended project design has eliminated the use of a Temporary Overburden Stockpile, so questions regarding its contents, such as peat or soil, and the separation of different overburden layers are no longer applicable.
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	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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.	Please see the response to comment number 132.
910	6.b	664		EAW should disclose the expected quantities each rock class.  Requested Action: Consider comment; modify text as warranted.	Please see the response to comment number 132.

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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>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
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 &gt;x%).</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	Please see the response to comment number 132.
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>	<p>Thank you for your comment. The 'material characterization program' referred to is indeed the same as the 'geochemical materials characterization program' described in line 655. This program involves comprehensive testing and analysis of rock and soil samples to determine their chemical and physical properties, including sulfur content and other parameters. The data gathered will inform rock classification, potential environmental impacts, and the development of mitigation strategies to ensure compliance with regulatory standards. This terminology will be used consistently in the documentation to maintain clarity. The EAW was edited as follows:</p> <p>EAW October 2023 (as written) "A geochemical materials characterization program is in progress that includes a comprehensive suite of static, kinetic, and mineralogical analyses on the geologic materials that will be moved during mining. "</p> <p>EAW December 2024 (as modified) "A geochemical materials characterization program is in progress that includes a comprehensive suite of static, kinetic, and mineralogical analyses on the geologic materials that will be moved during mining. [R2_Cmt_#136] [R2_Cmt_#913]"</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>	Thank you for your question. Yes, the geochemical materials characterization program includes analysis of over 100 parameters to assess the potential for materials to leach chemicals that could impact the environment. This comprehensive analysis will help inform reactivity and ensure the quality of water and air.
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>	Please see the response to comment number 132.

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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>	<p>Thank you for your question. The amended project design has eliminated the lined waste rock (development rock) stockpile.</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>	<p>Thank you for the comment. The Project will adopt the terminology in Minnesota Rules Chapter 6132 to refer to development rock and will revise the language accordingly</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>	<p>Thank you for your questions. The amended project design has eliminated the TBM, making this specific comment no longer applicable. However, the Project will adopt the terminology in Minnesota Rules Chapter 6132 regarding waste rock (development rock) and will revise the language accordingly.</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>	<p>Thank you for your question. The amended project design no longer includes the blending of high-sulfur rock with lower-sulfur rock. This change eliminates concerns related to sulfur classification adjustments and the potential risk of exacerbating leaching through blended materials.</p>
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>	<p>Thank you for your comment. The amended project design does not include the practice of blending high-sulfur and low-sulfur rock to create a mixture classified as Class 2 development rock.</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>	<p>Thank you for your comment. The amended project design no longer involves blending higher-sulfur rock with lower-sulfur rock. As such, questions regarding the process, location, or whether the blending would occur within a lined area are no longer applicable.</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>	<p>Thank you for your question. The amended project design has removed the practice of blending high-sulfur and low-sulfur rock, making questions related to gas emissions from such activity no longer applicable</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>	<p>Thank you for your question. The amended project design no longer includes the blending of high-sulfur and low-sulfur rock or exposed stockpiles. This eliminates concerns about these materials being subject to wind, rain, or snow during any blending process.</p>

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924	6.b	682		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.  Requested Action: Modify text to address comment.	Thank you for your comment. We will need clarification on the specific section of the EAW that this comment references, as it does not appear to align with the cited section. This will help ensure that the appropriate response or revisions can be made accurately.
925	6.b	687		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.  Requested Action: Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
926	6.b	687		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?  Requested Action: Answer question; modify text as warranted.	The backfill mixture would consist of rock and cement, with the fill rock sourced from waste rock or commercial aggregate. Typically, the volume of fill material required is approximately 50-60% of the in-situ ore by weight, due to the 'swell factor'—the phenomenon where fragmented rock does not compact perfectly back into the mined void, leaving significant void space.
927	6.b	687		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.  Requested Action: Add text to address comment.	Please see the response to comment number 203.
928	6	697		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.  Requested Action: Answer question; modify text as warranted.	Please see the response to comment number 203.
929	6.b	702		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.  Requested Action: Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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.	Please see the response to comment number 799.



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931	6.b	704		<p>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.</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for your question. The project has deleted the outdoor waste rock stockpile from the design. The edited EAW now includes the following text:</p> <p>"The building would be sized to include a buffer area of approximately 4,400 tons (4,000 tonnes) of ore and 4,400 tons (4,000 tonnes) of waste rock that would be used for backfill. [R2_Cmt_#224] [R2_Cmt_#931] "</p>
932	6.b	704		<p>Noise, vibration, and air quality impacts from the crushing facility must be evaluated in the EIS.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>
933	6.b	721		<p>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.</p> <p>Requested Action: Modify text with more appropriate characterization of the control technology necessary.</p>	<p>Thank you for your comment. Detailed information on dust control equipment, including systems designed to manage hazardous air pollutants (HAPs) and particulates, will be provided in the EIS.</p>
934	6.b	730		<p>Classifications are "waste rock." Any rock sent for processing is ore.</p> <p>Requested Action: Modify text to address comment.</p>	<p>Please see the response to comment number 917.</p>
935	6.b	730		<p>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.</p> <p>Requested Action: Confirm if Graphic 11 is incomplete.</p>	<p>Thank you for your comment. The graphic is intended to illustrate the expected flow of materials between underground and surface operations during mining, not to provide an exhaustive list of all potential solid wastes generated. The EIS will include a accounting of solid waste types produced by the project and their proposed management and disposal.</p>
936	6.b	730		<p>Graphic 11 shows "Sump Fines" but the EAW has no discussion regarding sump fines.</p> <p>Requested Action: Add text to address comment.</p>	<p>Please see the response to comment number 203.</p>
937	6.b	730	Table 11	<p>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."</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Please see the response to comment number 799.</p>

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938	6.b	730		Terminology seems misleading as well as inconsistent with Chapter 6132.  Requested Action: Consider comment; modify text as warranted.	Request clarity - what terminology seems misleading and inconsistent with Minnesota Rules part 6132?
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.	In the revised project design (EAW December 2024), the portal connects directly to the enclosed ore storage and rail loadout facility, ensuring that ore and waste rock remain covered and protected at all times. This eliminates exposure to outdoor atmosphere, wind, rain, or snow during transport. Negative air pressure and filtration systems will be implemented within the Ore Transfer building to contain and capture particulates when haul trucks enter or exit.
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.	Thank you for your comment. With the updated project design, the classification of development rock has been eliminated, making this question no longer applicable.
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.	Thank you for your question. The level of sulfur in the ore and waste rock transported by haul trucks is being determined through the comprehensive materials characterization program.
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.	Please see the response to comment number 939.
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.	Please see the response to comment number 939.
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.	Please see the response to comment number 939.

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945	6.b	734		<p>What practices (water, chemicals, covers for trucks) would be used to minimize fugitive dust from hauling ore to rail loadout facility</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Please see the response to comment number 939.
946	6.b	734		<p>Is rail loadout inside a building? If not, what is a "facility"? If so, why remove from lines 337?</p> <p>Requested Action: Consider comment, modify for clarity</p>	The EAW (October 2023) continued to describe the 'ore storage and rail loadout facility' as enclosed. "Inside the Ore Transfer Building, the railcar cover would be opened, then a front-end loader or conveyor systems would load the ore into the railcar. The covers would be closed and secured before railcars exit the ore transfer facility. [R2_Cmt_#946] " Managing and loading ore within an enclosed building remains unchanged in the revised plan.
947	6.b	736		<p>If known, would air scrubbers or fabric filters better control dust emissions?</p> <p>Requested Action: If known, answer question and update EAW accordingly.</p>	Thank you for your comment. The project team has selected to use wet scrubbers on the mine exhaust.
948	6.b	741		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your question. Run-of-mine (ROM) ore typically refers to the ore as it is blasted directly from the mine face. The size of ROM ore can vary widely, often ranging from small fragments to larger rocks of approximately 12 to 24 inches or more, depending on blasting techniques and geological conditions.</p> <p>The specific blasting design, including the spacing and depth of blast holes and the type and amount of explosives, influences the fragmentation size. Optimizing these factors helps achieve a balance between efficient rock breakage and minimizing the number of blasts and explosives used.</p>
949	6.b	746		<p>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?</p> <p>Requested Action: Modify text to address comment.</p>	Thank you for your question. The amended project design has eliminated outdoor surface stockpiles of overburden and waste rock, reducing the areas contributing to potential contact water. Additionally, crushing operations and mine vehicle traffic are managed within enclosed facilities, which minimizes dust and particulate generation outside designated contact water areas.
950	6.b	750		<p>RGU notes that exploration of an alternative location of the rail spur (e.g., along road) may be part of the scoping decision.</p> <p>Requested Action: Advisory</p>	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
951	6.b	756	Graphic 1	<p>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</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment. Graphic 6-1 was intended to illustrate the relationship between the surface and underground facilities rather than provide a detailed depiction for the site layout. Figure 3, Site Layout, showed a single track accurately for the design (EAW October 2023).</p> <p>However, in the revised design, the rail spur includes three tracks with an inspection road to support unit train operations, reducing the frequency of train trips required to transport materials to the site.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
952	6.b	764		<p>If known, describe what known contaminants in the contact water are and how they would be treated.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment Contact water is water that has directly interacted with ore or waste rock, both on the surface and underground, and is more likely to have elevated concentrations of sulfate and metals. The EIS will provide an analysis of the sulfate and metal concentrations to ensure appropriate management.</p>
953	6.b	772		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment. Additional details on groundwater management and closure strategies will be provided for evaluation in the EIS data submittal. However, the primary framework for reclamation and closure planning, including long-term groundwater management, will be addressed in detail within the Permit to Mine application.</p>
954	6.b	777		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for the advisory comment.</p> <p>Please see the response to comment number 365.</p>
955	6.b	777		<p>Describe the difference between construction water and contact water, and what concentrations of sulfate and metals may be present.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment. Construction water and contact water differ in their sources and potential contaminants. Construction water comes from excavation or construction activities, including groundwater or surface water removed to dry or stabilize areas, and may contain sulfate and/or metals. Contact water is water that has directly interacted with ore or waste rock, both on the surface and underground, and is more likely to have elevated concentrations of sulfate and metals. Contact water is collected and treated at the water treatment plant before discharge or reuse. The EIS will provide an analysis of the sulfate and metal concentrations in both types of water to ensure appropriate management.</p>
956	6.b	778		<p>Please define "industrial stormwater area" and "contact water area" and describe the difference between the two.</p> <p>Requested Action: Add text to address comment.</p>	<p>We appreciate your question. An 'industrial stormwater area' refers to portions of the project site where stormwater runoff originates from areas associated with industrial processes, such as employee parking or the fuel storage facility, and is managed according to industrial stormwater permits. A 'contact water area' includes areas where water directly interacts with exposed materials like ore or waste rock, which may contribute contaminants and require collection and treatment before discharge. The primary difference is that contact water involves direct exposure to potentially reactive materials and potentially necessitates more stringent treatment measures, while industrial stormwater is managed using best management practices defined by industrial stormwater regulations.</p>
957	6.b	780		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>The terms "precipitation" and "rain" are not explicitly used in Minnesota Administrative Rules, Chapter 7090. Instead, the chapter employs the term "stormwater," defined in part 7090.0080, subpart 12, as "stormwater runoff, snow melt runoff, and surface runoff and drainage." This definition encompasses all forms of precipitation-induced runoff without specifically mentioning "precipitation" or "rain."</p>

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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.	Thank you for your question. Non-potable water withdrawn from the well will ultimately be collected and managed through the project's water treatment systems. After its use and recycling within the underground operations, the water will be returned to the surface, treated, and either reused or discharged to the northern watershed in accordance with regulatory standards and permit conditions. Estimates of the volume of treated water to be discharged can be found under EAW Question 12 Water Resource.
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.	Thank you for your question. The quantity of well water expected to evaporate into the atmosphere will be detailed as part of the water balance model in the EIS. This comprehensive model will provide an analysis of water use and loss, including evaporation, to ensure accurate environmental assessments.
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.	Thank you for your question. The project will provide detailed information on the expected quantities of water to be withdrawn from the well for each phase of mine development, including construction, operation, and closure, as part of the Environmental Impact Statement (EIS) data submittal.
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.	Please see the response to comment number 992.
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.	Thank you for your question. Water recycled to the underground for use would be collected in the sump systems and returned to the surface for treatment. Some water loss would be expected due to evaporation.
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.	We appreciate your comment and the opportunity to provide clarity. Many civil projects, including those involving significant earthmoving and construction activities, generate construction water and stormwater that are managed using best management practices (BMPs) as outlined under the Construction General Stormwater Permit. Originally, the project design would have potentially produced construction water from the TBM, particularly when passing into bedrock, that may have required additional treatment. The chemical characteristics would have been evaluated in the EIS and NPDES permitting.  With the redesigned project, while TBM operations are no longer included, the commitment to managing construction water through BMPs and assessing additional water treatment where needed remains.

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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.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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.	Thank you for your comment. The area utilized by vehicles entering and exiting the underground mine during construction, operation, and closure is a small portion of the overall Project footprint. During operations, vehicle activity will be limited to the enclosed Ore Transfer Building, approximately 4 to 5 acres. Construction activities involving bedrock material and eventual closure activities are also expected to be limited to the same enclosed footprint.
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.	We appreciate your comment and will ensure that the EAW text clearly describes this aspect. The previous project design included vehicles operating as captive within the contact water area, and the updated design maintains this approach, with operations now fully enclosed within a building. This enhancement further limits potential environmental exposure.
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.	Thank you for your question. The amended project design has eliminated the need for open lined ditches, making this inquiry no longer applicable.
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.	Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.
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.	Thank you for your question. The amended project design has eliminated the need for open lined ditches, making the inquiry as to why they were not piped no longer applicable.

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971	6.b	832		<p>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?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for your questions regarding contact water management. In light of the amended project design, there is no longer a need to manage extreme precipitation events within the contact water treatment system, as areas exposed to such events fall under industrial stormwater regulations. Industrial stormwater will be directed and treated per standard stormwater regulations, without requiring storage in contact water tanks.</p> <p>The sizing of the contact water treatment plant will instead be based on anticipated groundwater inflows, and operational requirements, without considerations for surface runoff from extreme weather. These adjustments streamline the system's scope, and further details will be provided in the Environmental Impact Statement (EIS) data submittal</p>
972	6.b	832		<p>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.</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Please see the response to comment number 249.</p>
973	6.b	832		<p>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.</p> <p>Requested Action: Add text to address comment.</p>	<p>Please see the response to comment number 245.</p>
974	6.b	854		<p>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.</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for the comment. Due to the low porosity of fractured bedrock, typically less than 1%, groundwater displacement resulting from pressure grouting is expected to be minimal. The purpose of the sealing operations is to create a low-permeability barrier adjacent to the underground openings to limit water inflows. The exact volume of grout required will depend on factors such as the porosity of the rock mass, the specific sealing operations (including duration and pressure), and the hydraulic properties (e.g., hydraulic conductivity and specific storage).</p> <p>Several types of sealing materials are being considered for grouting; however, the plan is to utilize materials commonly employed in tunneling and mining operations. Both the extent of the grout application and specific details of the grout materials will be further addressed in the Environmental Impact Statement (EIS) data submittal.</p>
975	6.b	845		<p>RGU notes that the Contact Water Treatment Plant plan will need to be determined for evaluation in the EIS.</p> <p>Requested Action: Advisory</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>

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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.	Thank you for the comment. The analysis of potential impacts related to groundwater displacement, including effects on regional geology, hydrology, surface water, and ground subsidence, will be addressed comprehensively in the Environmental Impact Statement (EIS) data submittal. This approach allows for a detailed evaluation based on refined project information and specific hydrological modeling, ensuring that any potential impacts are accurately characterized and assessed within the appropriate phase of the environmental review process.
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.	Thank you for your comment. The EIS data submittal will include detailed information on areas of anticipated enhanced permeability based on the latest available data. This will encompass mapping, descriptions of expected areas of increased permeability, and an analysis of potential inflow volumes. Addressing this in the EIS will allow for a thorough evaluation informed by ongoing data collection and analysis, ensuring accuracy in characterizing these areas.
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.	Please see the response to comment number 979.
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.	The long-term effectiveness of grout would depend on factors such as the type of grout selected, the volume applied, and the groundwater flow characteristics in the grouted features. Grouting would be employed to reduce inflow rates by modifying the hydraulic properties of fractures. This approach would help manage groundwater inflow to support operational stability throughout the life of the mine. Further evaluation of grout effectiveness over time will be provided in the EIS data submittal.
980	6.b	872		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.  Requested Action: Consider comment; modify text as warranted.	Thank you for your comment. With the revised project design, the project should fall under industrial stormwater regulations, which provide detailed guidance for stormwater management and monitoring.
981	6.b	878		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.  Requested Action: Modify the text so that consistent terminology is used throughout the EAW.	For clarification, the plan in the Environmental Assessment Worksheet (EAW) indicated that water from mine excavation or tunnel boring machine (TBM) activities would go to water treatment before discharge. The amended design specifies that water from bedrock construction activities will be treated through a water treatment plant.



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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>	Please see the response to comment number 1120.
983	6.b	884	Table 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>	We appreciate your question regarding clarification. The wording 'watershed near the northern boundary' refers to the specific hydrological area within the Project Area and north of the surface development. This watershed includes natural and constructed channels.
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>	Please see the response to comment number 1120.
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>	Please see the response to comment number 983.
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>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
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>	<p>Added the following text to the EAW:</p> <p>EAW December 2024  "The total volume of water to be appropriated from groundwater (mine inflows and pumping from wells) would be variable during the life of Project and dependent on but not limited to the site water balance and volume and timing of groundwater inflows into the mine. The site water balance and prediction for timing and volumes of mine inflows would be discussed in the EIS data submittal and provide input to estimating the water to be appropriated from well(s). [R2_Cmt_#283] [R2_Cmt_#284][R2_Cmt_#987]"</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>	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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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>	<p>Thank you for your comment highlighting the importance of volume comparisons with the current flow regime of the Tamarack River and its connecting tributary. The conservative discharge rate from the water treatment plant, which includes mine inflow and contact stormwater, is estimated at 800-1,600 gpm. These preliminary calculations, predominantly influenced by mine inflow, will be updated and refined with additional data and modeling for the EIS. These volume estimates are detailed under EAW Question 12 Water Resource.</p>
990	6	913		<p>Please provide an estimate in cubic feet per second or gallons per minute.</p> <p>Requested Action: Modify text to address comment.</p>	<p>We appreciate your comment regarding the estimation of potable water use. The amended EAW contains this language:</p> <p>EAW December 2024  "The potable water well would supply water to the potable water treatment plant, with a capacity of 8,000 gpd or 5.5 gpm (30,200 L/day or 21 L/min), located within the Contact Water Treatment Plant building. [R2_Cmt_#990]"</p>
991	6.b	913		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Please see the response to comment number 960.</p>
992	6.b	919		<p>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</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>We understand the importance of ensuring clarity regarding the purpose of the water treatment facilities. The project includes a potable water treatment plant to provide drinking water that meets regulatory standards for human consumption. Separately, the contact water treatment plant is designed to treat water used in mining processes to meet applicable discharge or reuse standards. This confirms that water treated by the contact water treatment plant is not intended for potable use but will comply with all environmental regulations for non-potable water discharge or reuse.</p>
993	6.b	923		<p>Describe the sources, nature, and annual volume of the sanitary wastewater during mine development, construction, operation, and closure phases.</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for the comment. Additional details regarding the management of sewage wastewater during the operational period have been provided in Section 6.19.9, Management of Sewage Waste. During construction, temporary facilities (e.g., portable restrooms) will be provided. Information regarding the closure phase will be developed as part of ongoing project planning and included in future phases of environmental review.</p>
994	6.b	924		<p>Treatment method and compliance standards for treated sanitary water is not specified.</p> <p>Requested Action: Add text to address comment.</p>	<p>Please see the response to comment number 291.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
995	6.b	942		<p>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.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
996	6.b	942		<p>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?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for your comment. The Environmental Assessment Worksheet (EAW) notes the existing 69 kV transmission line operated by Great River Energy that crosses the northern end of the project area. This line, being below the 100 kV threshold, does not appear to trigger state permitting requirements for certificates of need or routing permits under Minnesota Rules 7849 and 7850. For the proposed substation, no separate state-level transmission permitting requirements have been identified at this time; however, Talon will ensure compliance with any applicable local permitting and environmental standards for its construction. The project costs for both the substation and transmission line will be covered by the mine owners, not ratepayers.</p>
997	6.b	943		<p>Quantify the power draw of the TBM.</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for your question. The amended project design has eliminated the TBM, making this specific comment no longer applicable.</p>
998	6.b	947		<p>Are propane and diesel storage tanks all above ground? How would fuel be transported to meet underground needs?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for the question. There are no buried fuel tanks. There will be fuel bays in the Ore Transfer Building and in the mine.</p>
999	6.b	951		<p>What is the supply source of the air used as compressed air? Will it be compressed on site from ambient air?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for the question. Yes, ambient air would be the source for compressed air, which will be compressed on-site to meet project needs.</p>
1000	6.b	956		<p>Please provide details on the power requirements, safety, and risks associated with the compressed air building.</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for your comment requesting details on the power requirements, safety, and risks associated with the compressed air building. Talon believes that if these aspects are to be addressed, they are best suited for analysis within the Environmental Impact Statement (EIS). Talon kindly asks the RGU to identify any specific risks they believe are associated with the compressed air system to ensure they are addressed appropriately.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
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.	Thank you for your comments on pipeline security, hydrological impacts, and leak prevention measures. Talon notes that the purpose of this document is to provide project descriptions necessary for the EIS scoping process rather than detailed design specifics, which will be further addressed during the Environmental Impact Statement (EIS) analysis.  The revised project design (EAW December 2024) has eliminated most buried pipelines, waste water pipelines, except for the discharge pipeline, are planned to be routed through the mine or within the surface buildings.
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.	Please see the response to comment number 1001.
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.	Please see the response to comment number 1001.
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.	Please see the response to comment number 1001.
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.	Thank you for identifying the discrepancy regarding infrastructure reclamation in the EAW. Talon acknowledges that the EAW currently states that all infrastructure will be reclaimed if there is no beneficial reuse. The Decline Ramp would remain, therefore, not all underground infrastructure will be removed.  The revised design (EAW December 2024) includes a single decline, rather than the dual decline loop, which would remain as a permanent structure. Talon updated the (EAW December 2024) text to clarify these points and ensure alignment with the current design and added the following sentence:  "The mine Decline Ramp, and mine development areas excavated outside the orebody would not be backfilled. [R2_Cmt_#1005] "  Details regarding Reclamation and Closure of this decline will be developed as part of the Permit to Mine application. Rule 6132.1100 requires the Permit to Mine application to include detailed plans for mining and reclamation, covering activities like closure and post-closure maintenance, which directly address infrastructure remaining post-closure.

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1006	6.b	999		<p>Describe what would be mitigated by intentionally increasing the rate of mine flooding.</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for the comment regarding potential acid mine drainage (AMD) risks associated with mine flooding. EAW December 2024 now includes the following additional information:</p> <p>"To advance this planning and provide important data for both permitting activities and EIS analysis, the project intends to develop a model to predict water quality in the underground mine post-operations. This model would incorporate the mitigation strategy of increasing the rate of mine flooding, as research shows that oxygen—a necessary component for acid rock drainage (ARD)—has a very low diffusion rate through water and becomes quickly depleted under flooded conditions. By minimizing oxygen exposure, this strategy effectively limits/halts ARD progression. Further details on water quality modeling and specific backfill and flooding plans would be available in the Reclamation and Closure Plan included in the Permit to Mine. [R2_Cmt_#200] [R2_Cmt_#201] [R2_Cmt_#202] [R2_Cmt_#203] [R2_Cmt_#1006] [R2_Cmt_#1007] [R2_Cmt_#1012]"</p>
1007	6	998		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Talon expects the entire mine to flood post-operations. As noted in response to comment 1006, this flooding will mitigate the risk of acid mine drainage (AMD).</p>
1008	6.b	998		<p>Describe why BMPs would not require complete backfilling of the mine access declines and mine development areas excavated outside the orebody.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment regarding the use of Best Management Practices (BMPs) and the rationale for not completely backfilling mine Decline Ramp and development areas outside the orebody. The Proposer notes that the primary purpose of backfilling is to facilitate the safe removal of ore by stabilizing areas directly involved in extraction. Additionally, most of the mine workings are located at significant depths, where there is no risk of surface subsidence propagation. Consequently, complete backfilling of Decline Ramp and non-orebody development areas is not necessary. This approach is designed to maintain safety while minimizing unnecessary material usage, aligned with BMPs.</p>
1009	6.b	998		<p>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."</p> <p>Requested Action: Add text to address comment.</p>	<p>We appreciate your question. The determination of the appropriate timing for bulkhead sealing of the mine portals will be guided by the requirements set forth in Minnesota Rules 6132, which emphasize ensuring stability and minimizing hydrologic impacts to protect natural resources. The decision on when to implement bulkhead sealing will be made in consultation with the Minnesota Department of Natural Resources (DNR) and detailed in the closure plan or permit to mine, with final approval by the commissioner and county mine inspector.</p> <p>The following language has been added to the EAW:</p> <p>EAW December 2024  "The determination of the appropriate timing for bulkhead sealing of the Ramp Decline would be guided by the requirements set forth in Minnesota Rules 6132, which emphasize ensuring stability and minimizing hydrologic impacts to protect natural resources. The decision on when to implement bulkhead sealing would be made in consultation with the Minnesota Department of Natural Resources (DNR) and detailed in the closure plan or permit to mine, with final</p>

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					approval by the Commissioner and County Mine Inspector. [R2_Cmt_#1009][R2_Cmt_#79]"
1010	6.b	998		As currently understood, why would mine development areas excavated outside the orebody not be backfilled?  Requested Action: Answer question.	Please see the response to comment number 1008.
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.	Thank you for the advisory comment regarding the potential for unfilled mine Decline Ramp to channel "surface water downward, which could affect nearby wetlands." Talon notes that the majority of the mine's Decline Ramp would be situated at significant depths below the water table. Following closure, these declines would flood, creating hydraulic pressure that would actually resist downward movement of surface water. This natural hydraulic balance minimizes the potential for surface water infiltration through the unfilled declines.  Additionally, Talon's Reclamation and Closure Plan would incorporate monitoring and protective measures to manage any potential water movement pathways, further safeguarding surrounding wetlands. Talon appreciates the opportunity to clarify this aspect of the project and looks forward to further discussion as needed.
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.	In response to your question, according to Minnesota Rules 6132, the process of sealing mine portals (bulkhead sealing) would need to be determined based on closure and post-closure maintenance requirements to ensure stability, minimize hydrologic impacts, and prevent the release of substances that could adversely affect natural resources. The decision for when and how to implement bulkhead sealing would typically be made in consultation with the Minnesota Department of Natural Resources (DNR) and outlined in the permit to mine or closure plan, with approval from the commissioner and county mine inspector

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1013	6.d	1031		Change "Talon Metals" to either "Talon Nickel's" or "the Project's"  Requested Action: Edit text as requested.	Thank you for your suggestion regarding terminology. The text will be updated to reflect 'Talon's' rather than 'Talon Metals', and references to the 'Tamarack Nickel Project' will be adjusted to 'Tamarack Mining Project' to ensure consistency.
1014	6.b	1036		Family-sustaining jobs would likely need longer employment than 7-10 years.  Requested Action: Consider revision.	Thank you for this question. "Family-sustaining" means jobs with pay grades well above average for the region.
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.	Thank you for your comment regarding iron within the deposit. Iron is indeed present in the mineralization along with nickel and copper and is naturally captured during extraction. In many sulfide deposits, including the Tamarack Intrusive Complex, iron typically occurs within iron-bearing sulfide minerals such as pyrrhotite, chalcopyrite, or pentlandite which are associated with the nickel and copper ore. As a result, while the primary extraction targets are nickel and copper, iron is included in the mineral composition and is effectively captured through the same processes.
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.	Thank you for your question. On January 20, 2022, Talon signed the Tesla Supply Agreement to supply 75kt of nickel in concentrate over a period of 6 years. The proposer has not yet signed agreements for the mine's remaining production.
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.	The best source of publicly available information regarding the Tesla agreement is Talon's Press Release from 10 January 2022.
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.	Thank you for this observation. Perhaps ironically, the longevity of Electric Vehicles (EVs) will constrain battery recycling opportunities in the near term. As the following Bloomberg article explains: "There aren't enough used electric-vehicle batteries to meet even 10% of the raw material demand for US EVs...Last year, Goldman Sachs projected that in 2030 just 7% of the high-grade nickel that goes into batteries will come from recycled sources. Circular Energy Solutions projects that North America's battery recyclers will be 183% overcapacity by 2030 if all announced plans are completed." Meeting the West's goals for combatting climate change will require additional domestic feedstock provided by the Tamarack mine. <a href="https://www.bloomberg.com/opinion/articles/2023-02-22/ev-battery-recycling-boom-has-arrived-too-soon#xj4y7vzkg">https://www.bloomberg.com/opinion/articles/2023-02-22/ev-battery-recycling-boom-has-arrived-too-soon#xj4y7vzkg</a> .
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.	Thank you for your comment regarding the impact of historical temperature increases on the project. Section 7 of the EAW addresses this by noting that the relatively short operational life of the project (7 to 10 years) limits the influence of long-term climate trends on project activities. The EAW data submittal concludes that temperature changes are expected to have minimal effect on the project within this timeframe.

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1020	7.a	1129		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1021	7.a	1137		<p>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.</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Thank you for your comment regarding the increase in 100-year storm events in Northeast Minnesota and the potential for flooding. The analysis in the EAW focused specifically on the frequency of 100-year storm events and did not assess other storm frequencies. Therefore, all events shown in the graph were classified as 100-year events. The Environmental Impact Statement (EIS) will provide additional information and analysis to address the scope and impact of such events on the project area.
1022	7.a	1139		<p>What impact will the projected total Project emissions have on short-term and long-term climate change?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Thank you for your comment on the projected impact of total project emissions on short-term and long-term climate change. This level of analysis will be addressed more thoroughly in the Environmental Impact Statement (EIS), where detailed assessments of greenhouse gas emissions and potential climate impacts will be conducted.
1023	7.a	1139		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Please see the response to comment number 1022.
1024	7.a	1139		<p>Greenhouse gas predictions. Are these predictions for the earth as a whole?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your question. The Representative Concentration Pathways (RCPs) referenced here model potential levels of greenhouse gases in the atmosphere and their warming effects on a global scale, rather than focusing on specific emissions predictions. This global framework helps evaluate broader climate outcomes, which can then be applied regionally, as done here with data downscaled to Minnesota. The EAW was edited to include this language:</p> <p>EAW December 2024 " The RCPs model potential greenhouse gas concentrations and the warming effects on a global scale, rather than predicting specific emissions levels. This global framework facilitates the evaluation of broader climate outcomes, which are then applied regionally by downscaling data to Minnesota. [R2_Cmt_#1024]"</p>
1025	7.a	1139		<p>Future climate projections and additional information about past climate can be found at <a href="http://www.heat.gov">www.heat.gov</a> and <a href="http://www.heat.gov/pages/climate-explorer">www.heat.gov/pages/climate-explorer</a></p> <p>Requested Action: Consider comment; edit text as warranted.</p>	Thank you for your comment and the suggestion to review additional sources on future climate projections. Further analyses will be conducted as part of the Environmental Impact Statement (EIS) development, with established sources forming the foundation for the climate impact assessment.



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1026	7.a	1162		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your comment regarding the impacts of temperature change on plants, fish, and wildlife in the Mississippi River watershed. Talon notes that broader climate trends, including temperature changes, will affect regional ecosystems independent of the project. However, the Environmental Impact Statement (EIS) will address how the project itself may interact with these existing vulnerabilities, focusing on any potential project-specific effects on local species and habitats. This approach allows for a more precise evaluation of the project's role within the context of anticipated climate-driven changes.</p>
1027	7.a	1172		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>
1028	7.a	1172		<p>To evaluate impacts on wetlands, ecosystems, also need to know evapotranspiration not just precipitation.</p> <p>Requested Action: Consider point and add text if warranted.</p>	<p>Thank you for your comment on the inclusion of evapotranspiration. A detailed analysis of evapotranspiration will be provided in the Environmental Impact Statement (EIS) as part of the climate impact evaluation. This will help further inform the assessment of climate-related factors within the project area. The EAW has been modified as follows:</p> <p>EAW October 2023 (as written)  "Because the UMN future climate datasets are presented in 30-year averages that do not include the years of Project life (2040-2059 and 2080-2099), a more detailed analysis of the climate change impacts during the project life will be addressed in the EIS. [R1_Cmt_#344]"</p> <p>EAW December 2024 (as modified)  "Because the UMN future climate datasets are presented in 30-year averages that do not include the years of project life (2040-2059 and 2080-2099), a more detailed analysis of climate change impacts during the project life will be addressed in the EIS, which will include an evaluation of evapotranspiration. [R2_Cmt_#1028] [R1_Cmt_#344]"</p>

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1029	7.a	1176		<p>Need to address how EPA predicted increase in 100-year storm intensity affects project. Do predictions cover even more extreme weather events?</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for your comment on the predicted increase in 100-year storm intensity and its potential impact on the project. The Environmental Assessment Worksheet (EAW) question guiding this analysis specifically requests a summary of climate trends and the anticipated impacts of climate change within the project's operational life. Given the duration of project operations (7 to 10 years) and recent design changes that significantly minimize exposure to atmospheric conditions, the Project has focused the analysis on foreseeable weather events and general climate trends likely to influence the project site.</p> <p>If further specificity is needed regarding extreme events with greater recurrence intervals, such as 200-year and 500-year storms, Talon would appreciate clarification to ensure the analysis aligns with the state's regulatory expectations.</p> <p>The EAW was edited as follows:</p> <p>EAW December 2024 "The EPA Climate Resilience Evaluation and Awareness Tool anticipates an increase in 100-year storm intensity of 13.5% in 2030 and 26.3% in 2060 (EPA, 2022B). These projections suggest heightened storm intensity over the long term. Stormwater management and infrastructure design will account for current and anticipated storm intensities to support project resilience throughout its lifespan, (7-10 years). This approach will ensure that the project's systems are appropriately designed to handle foreseeable conditions as informed by current climate data. [R2_Cmt_#1029]"</p>
1030	7.a	1177		<p>Need more information on streamflow predictions based on seasonal or variable increases, not just annual averages.</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for your comment regarding streamflow predictions and interest in seasonal or variable increases. The EPA Streamflow Projections Map provides estimates based on annual averages to offer a broad perspective of potential changes over time. The EAW was edited as follows:</p> <p>EAW October 2023 (as written) "The EPA Streamflow Projections Map anticipates an increase in annual daily average streamflow by a ratio of &gt; 1.2 to 1.4 in 2071 to 2100 (RCP 8.5) compared to baseline historical flow (1976 to 2005) (reference (13)). [R1_Cmt_#356]"</p> <p>EAW December 2024 (as modified) "The EPA Streamflow Projections Map anticipates an increase in annual daily average streamflow by a ratio of 1.2-1.4 for the period 2071 to 2100 under RCP 8.5, compared to baseline historical flow from 1976-2005 (Bureau of Reclamation, 2014). These projections offer a general view of potential long-term streamflow changes based on annual averages. [R1_Cmt_#356] [R2_Cmt_#1030]"</p>

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1031	7.a	1180		<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 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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1032	7.a	1183		<p>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?</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1033	7.a	1188		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Thank you for your comment regarding the potential consequences of vegetation loss on wild rice harvesting, native fish populations, and wildlife. Talon recognizes the importance of these ecological resources and will evaluate potential impacts in the Environmental Impact Statement (EIS). The EIS will provide an assessment to determine whether the project's development will have measurable effects on these resources and to identify any necessary mitigation measures.
1034	7.b	1188		<p>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).</p> <p>Requested Action: Advisory only.</p>	Talon appreciates the DNR's note on considering the potential effects of net vegetation loss and buffer removal on runoff during intense rain events. Talon plans to comply fully with general construction stormwater regulations, as outlined by the Minnesota Pollution Control Agency's (MPCA) National Pollutant Discharge Elimination System (NPDES) general construction stormwater permit. This permit provides essential guidelines for sediment and erosion control to mitigate the effects of runoff, particularly for large construction sites like the project facility. The Environmental Impact Statement (EIS) scoping process will help determine whether further analysis of these factors is warranted.
1035	7.b	1192		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	Thank you for the comment. The Environmental Assessment Worksheet (EAW) acknowledges potential impacts, including wetland loss and associated flood storage and carbon sequestration. These topics will be further addressed in greater detail in the Environmental Impact Statement (EIS) data submittal.
1036	7.b	1192	Table 5	<p>Table 5 project info: Rail line thru wetland may alter capacity and route of water thru that wetland.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	Thank you for your comment regarding the potential impact of the upland for the rail spur on water capacity and routing through wetlands. Table 7.1 summarizes how the project's activities interact with climate trends, including adaptations designed to address climate-related impacts, such as increased rainfall projections. While this table emphasizes climate adaptation, a detailed analysis of how the rail line may affect wetland hydrology and capacity is more appropriate for the Environmental Impact Statement (EIS),

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					where wetland and hydrology impacts will be assessed comprehensively.
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.	Talon notes the advisory comment regarding the potential inclusion of out-of-state emissions within the project's greenhouse gas assessment. Minnesota's regulatory framework typically focuses on emissions directly within the state. Talon appreciates the advisory nature of this comment and will ensure all relevant emissions are thoroughly assessed within Minnesota's regulatory requirements.
1038	7.b	1194		Footnote minimizes climate considerations due to "short duration" and "small footprint."  Requested Action: Consider comment; modify text as warranted.	Thank you for the comment. The project has noted that climate considerations are anticipated to have minimal impact due to the project's short duration and small footprint. However, if the state prefers that such statements are not included at this stage, the project is willing to adjust the language accordingly in consultation with the Responsible Governmental Unit (RGU).
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.	Thank you for your comment regarding the impacts of climate stresses on fish, wildlife, plant communities and sensitive ecological resources. Talon notes that broader climate trends, including temperature changes, will affect regional ecosystems independent of the project. However, the Environmental Impact Statement (EIS) will address how the project itself may interact with these existing vulnerabilities, focusing on any potential project-specific effects on local species and habitats.
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.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1041	8	1207	Table 7	Is there a reason why no green infrastructure proposed?  Requested Action: Answer question; modify text as warranted.	Thank you for your question. Green infrastructure (GI) is primarily applied in urban and suburban settings where impervious surfaces prevent natural absorption of stormwater, leading to runoff and potential flooding. GI features—such as rain gardens, green roofs, and permeable pavements—help mimic natural water cycles in these areas by managing stormwater through infiltration, evapotranspiration, and reuse, thereby reducing pressure on urban drainage systems.  In rural areas, where open landscapes allow more natural infiltration, GI is less commonly used. Traditional drainage systems are often preferred, especially in locations with high groundwater tables, as limited separation distances hinder the effectiveness of infiltration-based GI options.  For the Project, green infrastructure was not proposed due to the high groundwater table, which restricts the functionality of infiltration systems by reducing the necessary separation distance between the groundwater table and infiltration bases..

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1042	8	1208	Table 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.	Thank you for your comment. Detailed information on tree canopy removal, including specific locations, tree counts, and any potential effects on wooded wetlands, will be addressed in the EIS data submittal
1043	8	1218	Table 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.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1044	9	1218	Table 9	Lists EPA "Underground Injection Control Permit." What aspect of the project does this pertain to?  Requested Action: Answer question; modify text as warranted.	Thank you for the question. The EPA Underground Injection Control (UIC) Permit is listed in the EAW due to the potential need for a septic leach field as part of the project. Talon has included this permit as a precautionary measure to address regulatory compliance should a septic system be implemented.
1045	9	1218	Table 9	Change "(MDOT)" to "(MnDOT)". "MDOT" is "Michigan Department of Transportation".  Requested Action: Modify text to address comment.	Thank you for identifying the correct abbreviation for the Minnesota Department of Transportation (MnDOT).  EAW October 2023 (as written) “(MDOT)”  EAW December 2024 (as modified) “(MnDOT)[R2_Cmt_#1045]”
1046	9	1218	Table 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.	Thank you for the advisory comment. Talon notes the planned review of MPCA stormwater permits listed in Table 9.1 and looks forward to the agency's review of the project components, potential sources of stormwater, and applicable regulatory requirements.
1047	9	1218	Table 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.	Thank you for the question. The on-site pipelines planned for water conveyance are local to the facility and will be used to transport water requiring treatment before discharge to the environment. These pipelines are anticipated to fall under the regulatory scope of the National Pollutant Discharge Elimination System (NPDES) at the federal level and the State Disposal System (SDS) program in Minnesota, as they are associated with water treatment and discharge compliance.
1048	9	1218	Table 9	Does not identify permits for the substation and transmission line branch as needed for operations.  Requested Action: Add text to address comment.	Thank you for the comment. The Environmental Assessment Worksheet (EAW) identifies the existing 69 kV transmission line, operated by Great River Energy, which crosses the northern end of the project area. Since this line is below the 100 kV threshold, it does not appear to trigger specific state permitting requirements for certificates of need or routing permits under Minnesota Rules 7849 and 7850. For the substation, no separate state-level transmission permitting requirements were identified; however, Talon will ensure compliance with any applicable local permitting and environmental standards for substation construction.

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1049	9	1218	Table 9	<p>What hazardous waste generation will need permit? Full scope of chemicals not disclosed.</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for the comment. It appears this comment may relate more directly to Section 13 of the EAW, which addresses contamination, hazardous materials, and waste. In that section, Talon has provided an overview of anticipated hazardous materials to be used and stored on-site, including diesel fuel, gasoline, propane, lubricants, coolants, batteries, and explosives. Section 13 also outlines expected waste streams and the handling, storage, and transport practices to mitigate potential impacts. Additional details on hazardous waste management will be provided in the Environmental Impact Statement (EIS).</p>
1050	9	1218	Table 9	<p>What licenses, leases, and easements are needed to cross public lands and waters? Not discussed in text.</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for the comment. Talon recognizes the importance of securing appropriate permissions for crossing public lands and waters, as identified in the EAW. These items are noted as pending submittal and will be addressed in the Environmental Impact Statement (EIS) analysis and subsequent permitting as required.</p>
1051	9	1225	Table 9	<p>For consistency with the rest of the EAW, change "Section 21" to "Question 21".</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for identifying this inconsistency.</p> <p>EAW October 2023 (as written) "Section 21"</p> <p>EAW December 2024 (as modified) "Question 21"</p> <p>A similar inconsistency was found with a reference to Section 15 (found in Question 10)</p> <p>EAW October 2023 (as written) "Additional information regarding the cultural resource potential for the Project is discussed in Section 15 (Historic Properties)."</p> <p>EAW December 2024 (as modified) "Additional information regarding the cultural resource potential for the Project is discussed in Section 15.0 (Historic Properties)."</p>
1052	10.a.i	1228		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment. Please see the response to comment 387.</p> <p>To clarify, while exploration work may have been conducted within the 1854 Ceded Territory, no ore deposit has been identified there. Exploration activities, are preliminary assessments aimed at gathering information about the geological characteristics of an area to determine if further investigation is warranted. These activities alone do not confirm the presence of an ore deposit but rather assess the potential for one. We hope this distinction helps clarify the status of exploration work within the territory.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
1053	10	1230		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment. Talon has incorporated additional language into the land use description that provides context about the larger surrounding area, including Savanna State Portage Park and the Grayling Marsh Wildlife Management Area. Although no impacts are anticipated, these areas have been noted within the regional context of the watershed.</p> <p>The edit to the EAW is as follows:</p> <p>EAW December 2024 "The larger surrounding area includes other land areas that, while not directly impacted by the Project, are worth noting in the context of the local watersheds. Savanna State Portage Park, located approximately 7 miles northeast of the Project Area, is a notable recreational resource, and the Grayling Marsh Wildlife Management Area lies about 2.5 miles west of the Project Area. These areas provide important habitat and recreational opportunities. Although the Project is not anticipated to have direct or indirect impacts on these areas, they are part of the broader regional context and watershed. [R2_Cmt_#1053]"</p>
1054	10.a.i	1230		<p>Proposed railroad alignment crosses two types of DNR Forestry administered state lands: Consolidated Conservation (Con-Con) and School Trust lands</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for your comment. Talon updated the Zoning and Land Use figure to clearly differentiate the State-administered lands, including both Consolidated Conservation (Con-Con) and School Trust lands, as referenced. The EAW was edited as follows:</p> <p>EAW December 2024 "Figure 10 also shows tax forfeited county-administered lands, the state trust lands in consolidated conservation area and, the state administered lands in consolidated conservation area. [R2_Cmt_#1230]"</p>
1055	10.a.i	1237		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment regarding the Land Use section. Upon reviewing the comment, it references water flow patterns that eventually lead to Big Sandy Lake Reservoir. As the lake is located over 8 miles from the project site, Talon believes that this comment is more pertinent to the Water Resources section of the EAW.</p>
1056	10.a.i	1241		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment regarding cemeteries. Talon confirms that there are no cemeteries located within the Project Area. While Big Sandy Lake is over 8 miles from the site and outside of would be considered near, Talon appreciates the concern regarding potential indirect impacts within the broader watershed. Given the small area of surface development and compliance with a future NPDES permit, Talon does not anticipate any impacts to cemeteries in the Big Sandy Lake area or other locations outside of the Project Area.</p>

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1057	10.a.i	1262		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your comment regarding zoning. Mining activities, as outlined in the Aitkin County Zoning Ordinance and the Mining and Reclamation Ordinance, are permitted in areas zoned as Open and Farm Residential. The project will comply with all applicable zoning regulations, and no additional changes to zoning are necessary for the proposed development. The following language was added to the EAW:</p> <p>EAW December 2024 "No amendment to the zoning classification would be required for the proposed mining activities, as the project aligns with the existing zoning regulations. [R2_Cmt_#1057]."</p>
1058	10	1277		<p>Explain risk criteria for flooding with the water table within one foot of the surface at most of the site.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment regarding the risk criteria for flooding and the water table. Talon would appreciate clarification on the comment, as specific request is confusing. The reference to the water table being within one foot of the surface at most of the site is understood, but Talon is unclear about the intended connection to 'risk criteria for flooding.'</p> <p>Could you please clarify if the comment is addressing concerns about flood risks due to high groundwater levels, or if it is referencing a specific type of modeling or assessment you would like us to consider? Understanding the specific concern will help us provide a more informed and accurate response.</p>
1059	10.a.iv	1281		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Please see the response to comment number 1057.</p>
1060	10.b	1296		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>
1061	11.b	1147		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).</p>
1062	11.a	1296		<p>Surficial geology description does not provide enough detail. Please include sources for information. May want to consider adding cross section of quaternary aged sediment.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Please review comment number 403. The RGU indicated for a similar comment previously that it was resolved.</p>



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1063	11.a	1296		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	Thank you for your the comment. The comment has been considered.
1064	11.a	1296		<p>May want to further analyze or specify area of surficial disturbance and types of sediment that will be encountered.</p> <p>Requested Action: Consider comment; add text as warranted.</p>	Thank you for your the comment. The comment has been considered.
1065	11.a	1312		<p>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.</p> <p>Requested Action: Add text as requested.</p>	<p>Thank you for your comment. The following text has been added to the EAW:</p> <p>EAW December 2024  "The resource area is interpreted to consist of a multistage magmatic event which intruded mafic to ultramafic material into Thomson Formation siltstones and sandstones. The different intrusions include FGO (fine grained orthocumulate), CGO (coarse grained orthocumulate), and MZNO (mixed zone). The FGO can be found between approximately 80-1,800 ft (25-550 m) below surface. The CGO can be found between approximately 130-2,300 ft (40-700 m) below surface. The MZNO is typically found between the FGO and CGO. The intrusive package dips at approximately 15-20 degrees to the south. Sulfide mineralogy is predominately pyrrhotite, pentlandite, and chalcopyrite and typically hosted along the FGO/SED contact. [R2_Cmt_#1065]"</p>
1066	11.a	1312		<p>Please include more detail about bedrock competency by rock type.</p> <p>Requested Action: Add text as requested.</p>	Thank you for your comment. Additional text has been added to the EAW to provide more detail about the bedrock within the Project area (please see the response to comment number 1065).
1067	11.a	1312		<p>Please include cross-sectional information to better characterize overburden thickness and bedrock units.</p> <p>Requested Action: Add text as requested.</p>	A cross section (Graphic 11-1) of the intrusive body was added to the EAW.
1068	11.a	1317		<p>EAW notes that rocks were deposited in a "deep-water basin." Provide information on salinity, potential artesian locations.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	Water quality and hydraulic properties of the groundwater system will be included in the EIS data submittal.
1069	11.a	1321		<p>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.</p>	Discussion of the bedrock hydraulic properties in relationship to the geology will be discussed in the EIS data submittal.

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				Requested Action: Consider comment; modify text as warranted.	
1070	11.a	1325		<p>The EAW describes the extent of the Tamarack Intrusive Complex (TIC) mineralization. The EIS should analyze the cumulative impacts of mining the TIC.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1071	11.b	1350		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Thank you for the inquiry regarding surface flow directions and flooding under various climate conditions this will be discussed in the EIS data submittal.
1072	11	1358		<p>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.</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your comment. To clarify, approximately 58% of the soils on-site are classified as peat, muck, or contain standing water, rather than the 48% referenced in the comment.</p> <p>See response to comment number 1073.</p> <p>Table 11.1 has been updated in the EAW for additional clarification.</p>
1073	11	1360	Table 10	<p>This table suggests that more than 67% of the site has hydric soils. Text and tables should be consistent.</p> <p>Requested Action: Consider comment; modify text for consistency.</p>	<p>Thank you for your comment. The text has been revised to clarify that approximately 67% of the Project Area consists of hydric or predominantly hydric soils, ensuring consistency with the tabulated data.</p> <p>EAW October 2023 (as written) "Approximately 32% of the surficial soil within the Project area is classified as sandy loam to loamy sand, and approximately 10% of the area is classified as silt loam. The remaining portions of the Project area have soil classified as peat, muck, or have standing water."</p> <p>EAW December 2024 (as modified) "Approximately 32% of the surficial soil within the Project Area is sandy loam to loamy sand, and approximately 10% is silt loam. Hydric or predominantly hydric soils cover approximately 67% of the Project Area, including peat, muck, and standing water areas. The non-sandy soils are present on slopes of less than 1%. [R2_Cmt#_1073] "</p>
1074	11.b	1360		<p>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.</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Please review Figure 14 Soils for soil mapping details. The percentages in the table are for the whole Project Area (447 acres).

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1075	11.b	1367		<p>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?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>To address your inquiry the EAW was edited as follows:</p> <p>EAW October 2023 (as written) "Areas with peat or muck soils would be avoided to the extent possible. Primary surface facilities would be constructed in upland areas with well-drained sandy soil, to the extent practicable, for suitable engineering purposes."</p> <p>EAW December 2024 (as modified) "Areas with peat or muck soils would be avoided to the extent possible. Surface facilities would be constructed in upland areas with well-drained sandy soil, to the extent practicable. This choice supports efficient construction and reduces the need for additional fill material, as these soils are naturally more suitable for building. However, the feature that would be built on peat or muck soils would be the upland corridor for the rail spur. [R2_Cmt_#1075]"</p>
1076	11.b	1373		<p>Site clearing and grubbing 79 acres, fill of 553,000 cubic yards. What areas would be cut and filled?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for the comment. The volumes and areas have been updated in Table 11.2, Estimated Excavation, Grading, and Cut and Fill Balance. [R2_Cmt_#1076]</p> <p>However, the specifics regarding the locations for cut and fill placement are still being developed and will be addressed as project planning progresses.</p>
1077	12	1376		<p>The scope of the water quality and water level monitoring is unclear from the document. An overview of this monitoring area should be provided.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Please see the response to comment number 440.</p>
1078	12.a.i	1384		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>The impacts to wetlands will include the potential area of impact that will extend beyond the Project Area as appropriate and will be provided with the EIS data submittal. As the reviewers questions is not specific to the request of 12.a.i, no change to the EAW.</p>
1079	12.a.i	1384		<p>For consistency with the rest of the paragraph, list "Upper Mississippi River Basin" as "Mississippi River – Grand Rapids (HUC08 #07010103) Basin"</p> <p>Requested Action: Modify text to address comment.</p>	<p>The (HUC 8 #07010103) designation is a USGS classification and pertains to Prairie-Willow watershed within the USGS HUC 7 Upper Mississippi Region (based on 8-digit legacy classification). The DNR equivalent Major Watershed is named Mississippi River - Grand Rapids. Updated text:</p> <p>EAW December 2024 "The Project is within the USGS, Upper Mississippi River Region, Hydrologic Unit Code (HUC) 7 by 8-digit legacy classification (for a reference, HUC 2 for the 12-digit HUC classification). The watershed is further divided into the USGS HUC 8 Prairie-Willow (HUC-8, 07010103) watershed that is equivalent to DNR Major Watershed, Mississippi River-Grand Rapids. [R2_Cmt_#1079]"</p>

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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.	The direction of water flow in the wetlands will be provided with the EIS data submittal. As the reviewers question is not specific to the request of 12.a.i, no change to the EAW.
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.	Rearranged description in EAW to address:  EAW December 2024 "The portion of the Project Area within HUC12 Tamarack River watershed (Figure 16) flows north through a ditch network to the Tamarack River then into the Prairie River. The portion of the Project Area within HUC12 Mud Lake watershed (Figure 16) flows south and west through a ditch network to Minnewawa Creek and the Sandy River. The Prairie River and the Sandy River generally drain from east to west discharging into Big Sandy Lake. [R1_Cmt_#426][R2_Cmt_#1081]"
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.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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.	The Public Water Basins are provided in the HUC 10 and HUC 12 watershed map figure. The information provided within 1 mile of Project in the public water basin table is specific to the spatial extent specified in question 12.a.i.
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.	Thank you for your comment. Loon Lake is located over 10 miles from the project site and lies outside the two immediate watersheds (Mud Lake and Tamarack River) identified as near the project. Given this distance, the intervening Prairie and West Savanna Rivers, and distinct watershed boundaries, Loon Lake was not included in the EAW data submittal.
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.	Added the qualifier to footnote to table summarizing Public Waters Basin: Wild rice may be present in streams, rivers and lakes that are not listed in the EAW. [R2_Cmt_#1085]
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.	The water bodies listed in in the Public Basin and Watercourses tables are specific to Mud Lake and Tamarack River watersheds that includes a 1 mile radius (specific to the spatial extent of question 12.a.i.) from the Project Area. Lake Minnewawa is not listed as not within these two watersheds. For completeness, Lake Minnewawa is shown on the HUC 10 and HUC 12 watershed map for Big Sandy Lake.

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1087	12.a.i	1414	Figure 12	<p>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.</p> <p>Requested Action: Add all waterbodies to table.</p>	Please see the response to comment number 1086.
1088	12.a.i	1429	Figure 12	<p>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.</p> <p>Requested Action: Add all waterbodies to table.</p>	We appreciate your comment. The response to question 12.a.i. in the EAW was provided according to the spatial extent outlined in the form, which specifies: 'Include the presence of aquatic invasive species and the water quality impairments or special designations listed on the current MPCA 303d Impaired Waters List that are within 1 mile of the project. Include DNR Public Waters Inventory number(s), if any.'
1089	12.a.i	1434		<p>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.</p> <p>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.</p>	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.
1090	12.a.i	1438		<p>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.</p> <p>Requested Action: Consider comment. Add to Figure as warranted</p>	Three watershed maps at different scales have been provided. The regional scale map includes the Big Sandy Lake Watershed (i.e. HUC 10 watersheds Big Sandy Lake Outlet and Headwater to Big Sandy Lake) that shows the Wild Rice Public Waters Basins (MPCA Wild Rice Producing Waters online tool, viewed in October 2024). The intermediate scale map is focused on the HUC 12 watersheds that includes the Project Area, Tamarack River and Mud Lake. This map includes the Public Waters Basins, Public Waters Watercourses and impairments as listed in accompanying tables. The final map is the smallest scale that includes the Project Area with a 1 mile radius as dictated in question 12.a.i. There are no Public Waters Basins within the one mile radius of the Project Area and the Public Waters Watercourses are ditches. There are no impairments for the Public Waters Watercourses within the one mile radius of the Project Area.
1091	12.a.i	1454		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	Please see the response to comment number 1090.

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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.	There are no impairments within the one mile radius of the Project Area as specified in question 12.a.i. A map has been provided based on the one mile radius. Impairments within the HUC 12 watersheds that includes the Project Area, Tamarack River and Mud Lake, that covers an area greater than the one radius specified in question 12.a.i. is provided on a map and in accompanying tables.
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.	Thank you for the comment. The statement regarding the unmodernized FEMA floodplains was intended to indicate that these delineations may not be suitable for certain regulatory determinations, such as those that require modern, highly accurate mapping (e.g., for permitting decisions). However, we agree that, under MEPA and NEPA, any available floodplain information should be considered during environmental review to understand potential flood risks, even if it is based on older, unmodernized delineations. The Project Area is located outside the FEMA-delineated floodplain.
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.	Please see the response to comment number 440.
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.	Please see the response to comment number 440.
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.	Thank you for asking for clarification. The wording in the EAW has been modified to include the specific agencies the delineation report was submitted to, as follows:  EAW October 2023 (as written) " This delineation report was submitted to the agencies on 17 July 2023 and is pending review from the area technical evaluation panel, which consists of members of the local, state, and federal government agencies."  EAW December 2024 (as modified) "This delineation report was submitted to the agencies on 17 July 2023 and is pending review from the area technical evaluation panel, which consists of members of the local (Aitkin County), state (DNR), and federal government agencies (USACE).[R2_Cmt_#1096]"

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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.	Please see the response to comment number 440.
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.	Please see the response to comment number 440.
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.	For clarification, is the hydraulic condition for groundwater discharging into the lake (termed baseflow) or a spring defined as groundwater discharge to ground surface? If existing, please provide additional documentation or reporting.
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.	The statement that there is no MDH wellhead protection area in the Project Area and the nearest MDH wellhead protection area is in McGregor located about 9 miles west from Project Area is deemed sufficient for the EAW.
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.	The requested information on private wells in the Project Area is provided in the EAW.
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.	Please see the response to comment number 440.

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1103	12.a.ii	1511		<p>One mile distance is not enough for a proper evaluation of baseline impacts. See the PolyMet FEIS</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>While the PolyMet project provides a reference for certain aspects, referencing it as a basis for limits of review for the Tamarack Mining Project (Project) requires caution, given the significant differences in each project's design, scale, and environmental impact approach.</p> <p>The Project plans to process approximately 3,000 tons of ore per day, whereas the PolyMet NorthMet Project is designed for a much higher processing rate of about 32,000 tons per day—over ten times greater than that of the Tamarack Project. Additionally, PolyMet is an open-pit mine with multiple planned pits collectively impacting around 1,000 surface acres. PolyMet's tailings and waste rock management infrastructure alone will span hundreds of acres, reflecting the extensive surface area required to manage waste rock and byproducts from its high-capacity mining and ore-processing activities, which necessitate substantial containment and water treatment facilities.</p> <p>In contrast, the Tamarack Mining Project (Project) is an underground operation with a significantly smaller surface footprint, well under 100 acres. This underground approach minimizes surface disturbance, as Project does not require open pits, surface-based tailings facilities, or ponds for waste rock and tailings management. Unlike PolyMet, which relies on extensive surface waste management infrastructure, the Project's design inherently limits the surface area needed for these purposes.</p> <p>Minnesota Administrative Rules Chapter 6132 mandates that each mining project undergo a comprehensive, individualized environmental review to ensure compliance with specific performance standards tailored to each project's unique design and environmental setting. This regulation underscores the importance of individualized assessment to protect natural resources and address distinct environmental risks and impacts. Using PolyMet's FEIS as a benchmark for establishing the Projects impact limits would not accurately reflect Project's significantly reduced surface footprint or its unique environmental considerations associated with underground mining.</p> <p>In summary, the PolyMet FEIS is not an appropriate basis for the Project due to fundamental differences in mining methods, scale of surface impact, and waste management approaches. An assessment specific to the Project's characteristics is necessary to accurately evaluate its potential environmental impacts and ensure compliance with Minnesota's nonferrous metallic mineral mining standards.</p>



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1104	12.a.ii	1523		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Currently there are no water supply wells used for the Project and existing domestic wells in the Project Area are described in the EAW. Talon has identified a well-sorted sand unit (relatively minor silt and clay content [fines] compared to overlying units) in the bottom section of the quaternary at depths between 67.0 and 93.6 ft based on the drilling of a well within the uplands in the area of the proposed surface facilitates. Talon has named this unit the basal outwash unit. Because of its limited fines content, the basal outwash unit has relatively high water transmitting capacity compared to overlying units. Accordingly, the basal outwash unit has favorable hydraulic properties for water supply and considered an option for water supply well(s) for the Project. The details for the geologic and hydrogeologic characterization including pumping tests will be provided as part of the EIS data submittal.</p>
1105	12.a.ii	1529	Figure 15	<p>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.</p> <p>Requested Action: Answer the question; future discussion item for the Draft Scoping Decision Document</p>	<p>Please see the response to comment number 440.</p>
1106	12.a.ii	1533		<p>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?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for your in regarding upland and wetland delineation. Uplands are defined as areas that do not meet the criteria for wetlands. Based on the delineation work conducted, wetlands have been identified, and Talon has received verbal concurrence from the U.S. Army Corps of Engineers, the Minnesota Board of Water and Soil Resources (BWSR), and the Department of Natural Resources (DNR) regarding these findings.</p> <p>As described in the EAW the Project Area characterized does include surface lands above the mine workings.</p>
1107	12.b.i.3	1567		<p>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)?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Please see the response to comment number 513.</p>
1108	12.b.i.3	1579		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Talon has reviewed this comment in light of the amended design. All surface contact water will be inside buildings with flooring graded to collection areas and then the surface contact water would be routed to the water treatment plant.</p>

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1109	12.b.i.3	1583		<p>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?</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
1110	12.b.i.3	1587		<p>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?</p> <p>Requested Action: Answer questions if known.</p>	<p>Please see the response to comment number 291 - which addresses question 1.</p> <p>Please see the response to comment number 245 - which addresses question 2.</p> <p>Thank you for your question 3. The specific details regarding discharge scheduling will be addressed in the EIS data submittal. At present, continuous discharge is anticipated</p>
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>	<p>Thank you for your comment. Future discussion item, as necessary, in 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>	<p>The effects related to the discharge from mine to the environment will be assessed in the EIS.</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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</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>	<p>Thank you for your comment. The clarification regarding channel-forming flow and ecosystem effects, particularly the representativeness of conditions around LV-006 relative to downstream areas, is noted. Considerations around these aspects remain part of the broader evaluation of water resource impacts in the project's water management planning.</p>

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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>	Material linkages between the proposed mine and aquatic biota will be evaluated in the EIS.
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>	Material linkages between the proposed mine and groundwater quality will be evaluated in the EIS. Climate change model predictions will be considered in the assessment of impacts.
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>	As stated in EAW - "Limited to no effect is expected because, as noted in reply to Section 12.b.i.3), the water balance in the area and the patterns of large precipitation events are expected to remain in the current range during the timeframe that the Project would be operational. Any potential effects would be mitigated by the same factors discussed above: control of stormwater discharge volumes and rates, industrial stormwater treatment systems, compliance with industrial stormwater requirements under an NPDES/SDS permit. Additional quantitative assessments would be performed and provided in the EIS data submittal."
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>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1119	12.b.i.3	1643		<p>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,</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	Please see the response to comment number 963.

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1120	12.b.ii	1658		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>The Project's stormwater management approach has been designed with a commitment to minimizing potential chemical pollutants in stormwater discharges, adhering closely to the principles outlined in the Industrial Stormwater General Permit. Originally (EAW October 2023), areas with components likely to contribute to chemical pollutants, such as ore or waste rock, were isolated and managed to collect and actively treat runoff, removing metals and other potential contaminants before discharge.</p> <p>In the enhanced, current design (EAW December 2024), these components are now fully enclosed, ensuring that materials associated with potential chemical contributions are not exposed to stormwater. This approach significantly reduces the likelihood of introducing metals or other chemical constituents into stormwater runoff. While benchmark monitoring for exposed materials is generally required for non-ferrous mining operations, this improved design has effectively removed these materials from exposure.</p> <p>Talon remains committed to environmental protection and looks forward to the discussion of monitoring requirements during permitting.</p>
1121	12.b.ii	1661		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for your comment. This consideration is no longer applicable, as the amended design has removed stockpiles and minimized the surface footprint, eliminating the potential for problematic inflows during heavy rain events.</p>
1122	12.b.ii	1663		<p>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</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your comment. The original project design, as detailed in the June 2023 EAW data submittal, proposed an open surface footprint, which included areas of potential contamination from ore and waste rock. This configuration necessitated a robust stormwater management plan to collect, treat, and discharge contact water generated during storm events, with sizing aimed at managing up to a 200-year 24-hour storm event. Talon has since revised the design (EAW December 2024) to enclose these components, effectively eliminating the sources that would have required capture and treatment.</p> <p>With the updated enclosed design, stormwater falling on the surface is no longer exposed to contaminants from the mine and can now be managed under industrial stormwater regulations. This adjustment removes the need for extensive contact water management system to handle large storm events, as the facility no longer generates from storm events contact water requiring specialized treatment. This redesign enhances the project's resilience to climate change impacts by reducing vulnerability to contact water management challenges associated with large storm events, resulting in a more effective approach to stormwater management.</p>

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1123	12.b.ii	1666	Table 15	<p>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?"</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Thank you for your question. Please consult response to comment number 1120.
1124	12.b.ii	1673		<p>How would change in land cover, runoff, discharges affect nearby wetlands, particularly in periods of high water?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Thank you for your comment. Potential effects of changes in land cover, runoff, and discharges on nearby wetlands, particularly during periods of high water, will be addressed in the EIS data submittal.
1125	12.b.ii	1678		<p>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.</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Thank you for your comment. The amended project design has eliminated the extensive surface contact zone that previously required significant water collection, storage, treatment, and discharge. Now the remaining surface footprint would be managed under industrial stormwater regulations, which include specific guidance on stormwater management and monitoring requirements. These regulations account for precipitation events by incorporating measures for the initial wetting and subsequent runoff, ensuring effective control and mitigation of any potential impacts.
1126	12.b.ii	1684		<p>Does not discuss the risks from climate change rainfall intensity. Risks include not only greater flooding, but introduction of harmful chemical parameters.</p> <p>Requested Action: Add text to address comment.</p>	Please see the response to comment number 400.
1127	12.b.ii	1686		<p>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".</p> <p>Requested Action: Modify text to address comment.</p>	The text of the EAW was modified as suggested.

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1128	12.b.ii	1692		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted. To be discussed in development of Draft Scoping Decision Document</p>	<p>The EAW identifies the primary receiving water for the project as the ditch immediately north of the facility. This ditch functions as the initial point of discharge, in line with standard interpretations for receiving water, which refers specifically to the body of water that first receives effluent directly from a point source. The waters noted in the comment—Lake Minnewawa, Horseshoe Lake, Minnewawa Creek, Sandy River, and Big Sandy Lake—are within the broader watershed and some are located downstream from the Project Area.</p> <p>EAW October 2023 (as written) "Based on the MPCA's special and impaired waters search tool (reference (30)), there are no receiving waters that have construction-related water impairments or are classified as special as defined in the Minnesota Construction Stormwater General Permit."</p> <p>EAW December 2024 (as modified) "Based on the MPCA's special and impaired waters search tool (USGS, 2022B), no receiving waters associated with the project construction area have been identified with construction-related impairments or are classified as special under the Minnesota Construction Stormwater General Permit. [R2_Cmt_#1128]"</p>
1129	12.b.ii	1709		<p>How much water is proposed to be appropriated from groundwater, at what locations, and at what times?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Please see the response to comment number 987.</p>
1130	12.b.iii	1712		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Please see the response to comment number 553.</p>
1131	12.b.iii	1717		<p>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.</p> <p>Requested Action: Advisory only.</p>	<p>Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.</p>
1132	12.b.iii	1724		<p>Please provide a graphic representation of the tunnel loop superimposed on wetland delineation.</p> <p>Requested Action: Consider comment, add graphic.</p>	<p>Thank you for your suggestion regarding the graphic representation of the tunnel loop superimposed on the wetland delineation. Talon appreciates the opportunity to clarify that the tunnel loop is no longer being considered as part of the Project.</p>

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1133	12.b.iii	1724	Graphic 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.	Thank you for your comment. With the redesign of the project, a number of graphics have been updated to address prior concerns, including clarifications on facility placement and wetland delineation.
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.	Thank you for your inquiry. In response, please note that the language in the EAW was updated from this:  EAW October 2023 (as written) "Potable water would be sourced from a new well located in proximity to the facility and if needed treated at a potable water treatment plant. Potable water would be used for restrooms, showers, food preparation, and drinking water ."  To the following: EAW December 2024 (as modified) "Potable water for the facility would be sourced from a new well situated in proximity to the facility. The EIS would provide additional details regarding the precise location and design of the well. Based on preliminary assessments, the well is expected to draw from the basal permeable outwash sediment to ensure a reliable supply. [R2_Cmt_#1134]"
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.	Please see the response to comment number 350.
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.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
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.	The text of the EAW was modified as suggested.
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.	The text of the EAW was modified as suggested.

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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.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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.	A high level overview is provided in response to Comments 440 and 513. The details for the groundwater characterization program will be discussed in the EIS.
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	The potential changes to groundwater levels due to the project under various climate change scenarios will be evaluated in the EIS.
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.	The maximum anticipated deflection at the surface is less than 0.2 inches, indicating that surface subsidence is expected to remain zero to negligible across the area. Talon will include additional subsidence analysis and supporting data in the Environmental Impact Statement (EIS) to provide a comprehensive understanding of projected impacts.  The EAW was edited as follows:  EAW October 2023 (as written) Numerical and empirical analysis of these planned excavations indicates crown pillar (Graphic 10) deflection of less than 0.2 inch at the surface, thus zero to negligible surface subsidence is expected.  EAW December 2024 (as modified) "Numerical and empirical analysis of these planned excavations indicates crown pillar deflection would be negligible, thus surface subsidence is not expected. [R2_Cmt_#1144]"
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.	Thank you for the comment. At this time, the project is in the process of developing the project description that will be used for EIS scoping. The evaluation of potential wetland impacts will be part of the EIS, whereas specific compensatory mitigation measures, will be addressed during the permitting phase. The project remains committed to complying with both state and federal regulations regarding wetland mitigation.
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.	Design specifics for discharge the structure associated with the water treatment plant are currently under development. This structures designs will depend on results from ongoing flow modeling and the comprehensive water balance analysis currently underway. Once complete, the details will be included in the EIS.



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					Talon appreciates the inquiry and the opportunity to clarify the current progress on these essential project components.
1145	12.b.iv.b	1805		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Talon appreciates the inquiry regarding compliance with the Wetland Conservation Act (WCA) for the existing public drainage system. The drainage ditches referenced were originally constructed in the early 20th century with the purpose of supporting agricultural drainage and other land management needs, predating the enactment of the WCA by several decades. These ditches primarily serve upland areas not currently mapped as wetlands.
1146	12.b.iv.b	1807		<p>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?</p> <p>Requested Action: Answer question; modify text as warranted.</p>	Talon appreciates the concern regarding potential downstream hydrology impacts related to treated water discharge, watershed alterations, and stormwater management. At this phase, Talon's efforts are concentrated on developing a clear project description for the Environmental Impact Statement (EIS) scoping process. This foundational work will guide the thorough assessments planned within the EIS, where hydrological impacts, including indirect effects on water flows, levels, and quality, will be carefully evaluated.
1147	12.b.iv.b	1810		<p>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".</p> <p>Requested Action: Modify text to address comment.</p>	The text of the EAW was modified as suggested.

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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>	<p>The term "laydown area", that is referenced in this comment has been changed to refer to the area as the "Exploration Staging Area". This area is currently used in support of exploration activities. The term "laydown" will now only be used in relationship to the construction phase of the project. The EAW has been modified as follows:</p> <p>EAW October 2023 (as written)</p> <ul style="list-style-type: none"> <li>• Aboveground tanks (TS0130875) at the laydown area (Figure 17);</li> <li>• Hazardous waste small quantity generator status (Figure 17);</li> <li>• Storage and use of hazardous materials and petroleum products associated with drill pad locations and laydown area ;</li> <li>• Refuse related to work at drill pad locations and laydown area;</li> <li>• Septic system and/or leach fields associated with the house and farmhouse at the site;</li> <li>• Buried drill cuttings in the laydown area.</li> </ul> <p>EAW December 2024 (as modified)</p> <ul style="list-style-type: none"> <li>• Aboveground tanks (TS0130875) at the exploration staging area [R2_Cmt_#1149] (Figure 9);</li> <li>• Hazardous waste small quantity generator status (Figure 9);</li> <li>• Storage and use of hazardous materials and petroleum products (e.g., oil, fuel) associated with drill pad locations and the exploration staging area; [R2_Cmt_#1149]</li> <li>• Refuse related to work at drill pad locations and the exploration staging area; [R2_Cmt_#1149]</li> <li>• Septic system and/or leach fields associated with the house and farmhouse at the site;</li> <li>• Buried drill cuttings in the exploration staging area. [R2_Cmt_#1149]"</li> </ul>
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>	<p>Thank you for your comment. The EAW was updated to clarify distinctions between the existing laydown area, currently in use for exploration activities, and the proposed laydown area associated with future mine construction, as described in Table 6.1 (see response to comment #1148). The existing laydown area is used for staging equipment, oil, fuel, and other supplies as part of ongoing exploration activity. The proposed 21-acre laydown area for the construction phase will adhere to required standards for the storage of hazardous materials and petroleum products..</p> <p>Further details on chemical reagents, anticipated waste production, and the specifics of hazardous material management during mine operation will be included in the EIS.</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. 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>	<p>Exploration drill cuttings are managed as part of the exploration permit. Talon is in compliance and will continue to comply with cuttings disposal as specified under the permit.</p> <p>Exploration drill cuttings are managed under MN Rule 4727.0940 and as specified under Talon's approved exploration plan.</p>

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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>	<p>Thank you for your comment. The EAW has been updated to include disposal of the residuals from the water treatment process. These residuals are expected to be managed as solid waste. However, options for beneficial reuse are being investigated. The EAW was edited as follows:</p> <p>EAW December 2024 "The Project would also generate residuals from the water treatment process. These residuals are anticipated to be managed as solid waste in accordance with applicable regulations. [R2_Cmt_#1151]"</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>	<p>Thank you for your request regarding hazardous materials disclosure. The primary purpose of the EAW is to provide sufficient information to support a scoping decision for the project. Specific details, such as the usage and management of hazardous materials, will be addressed in the Environmental Impact Statement (EIS) and the appropriate operational permits.</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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</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>	<p>Thank you for the clarification. The text of the EAW has been edited accordingly.</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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
1156	14.a	1985		<p>Add in Land Type Association (LTA) to add finer scale ecological context. LTAs capture finer scale information on landforms, soils, topography and vegetation.</p> <p>Requested Action: Advisory only; to be discussed in draft scoping decision document</p>	<p>Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>

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1157	14.a	1991		<p>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.</p> <p>Requested Action: Answer question; modify text as warranted.</p>	<p>Thank you for asking for clarification. The area described as being dominated by wetlands does indeed include the surface area above the proposed underground mine. The Environmental EAW defines the Project Area, the area that covers both the boundary of the surface operations and the area above the underground mining activities. By including these aspects, we ensure that the wetland resources within the entire Project Area are evaluated as part of the EIS.</p>
1158	14	1994		<p>Assuming one of the ditches is that proposed to receive the treated wastewater discharge, the PCA sampled the unnamed ditch (unnamed trib) mentioned in v2 line 1203, and found pike, burbot, white sucker and central mudminnow.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for bringing this sampling information to our attention. To better understand the context and findings, Talon would appreciate it if the DNR could provide the report and spatial data associated with the sampling of the unnamed ditch, particularly any details related to the presence of pike, burbot, white sucker, and central mudminnow. Access to this data will assist in further refining our analysis and ensuring that the EIS thoroughly addresses the ecological characteristics of the receiving waters.</p>
1159	14.a	1994		<p>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?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for your comment and for raising these questions. The ditches in the project area were constructed between 1900 and 1930, likely as part of efforts to convert land for agricultural use during that period. While it is possible that drainage of wetlands occurred as a result of these activities, Talon does not have definitive information about the original intent behind the construction of the ditches.</p> <p>Regarding fish habitat, Talon will review and update data to reflect current conditions during the EIS process. Our analysis focuses on ensuring that any conclusions about fish habitat are based on recent surveys and studies of existing conditions rather than assumptions about historical use.</p> <p>As this topic will be reviewed in the EIS process, Talon has removed the phrase, "As such, habitat suitable for fish is not present in the Project Area." from the EAW text from section 20.1.3.</p>
1160	14.a	1995		<p>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.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your comment. Please see the response for comment number 1158.</p>
1161	14.a	2003		<p>More detailed information about survey data being collected, scope of the survey work and how indicators were selected should be provided.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>

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1162	14.a	2003		<p>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.</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for your comment. Additional descriptions of natural resource surveys will be discussed, as necessary in the development of Draft Scoping Decision Document.</p>
1163	14.b	2005		<p>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.</p> <p>Requested Action:</p>	<p>Thank you for highlighting this consideration. Talon recognizes that data provided through the Natural Heritage Information System and the Minnesota Conservation Explorer may be limited in scope due to the absence of recent or site-specific surveys in certain areas. Talon acknowledges this limitation and, as part of the Environmental Impact Statement process, will consider the need for additional field surveys to confirm the presence or absence of suitable habitats or state-listed species within the project area.</p>
1164	14.b	2011		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment and for raising concerns about potential impacts such as mercury release, noise, and air pollution on threatened and endangered species. The Environmental Assessment Worksheet (EAW) question specifically requests a description of rare features, including the presence of state-listed species and suitable habitats within or near the project area, based on available data and surveys. As such, our response to this question focuses on identifying species and habitats using data from resources like the U.S. Fish and Wildlife Service (USFWS) IPaC tool and the Natural Heritage Information System (NHIS).</p> <p>We understand that indirect effects, such as changes in water chemistry, noise, and air quality, are important considerations for evaluating potential impacts on species. These aspects will be addressed more comprehensively as part of the Environmental Impact Statement (EIS) process, which is designed to analyze the broader environmental effects of the project, including indirect and cumulative impacts on species and their habitats.</p>
1165	14.b	2011		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted</p>	<p>Thank you for your comment. The Environmental Assessment Worksheet (EAW) includes an analysis of state-listed species and their habitats based on data from the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool and the Minnesota Natural Heritage Information System (NHIS). This analysis, conducted by Barr Engineering, reviewed rare species occurrences within one mile from the Project Area and identified species such as the Canada lynx, northern long-eared bat, and gray wolf as potentially present.</p> <p>While we understand that species like sharp-tailed grouse, sandhill cranes, and trumpeter swans are important considerations, they were not identified in the available data sources as being within close proximity to the project area. Talon remains committed to accurately assessing all species that may be impacted by the project, and any additional information on species presence is welcome as we continue the environmental review process.</p>

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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>	<p>Thank you for highlighting this concern. Talon acknowledges the potential impact of mercury on ecological systems, including its effects on species like the northern long-eared bat. Recognizing the importance of understanding these pathways, Talon is considering the use of a mercury model to better assess any potential risks. This model would help evaluate the potential effects of mercury, including its accumulation in insects, which could indirectly impact bat populations in the region.</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>	<p>Thank you for your comment. The EAW has been updated to include rivers and streams. Please see the response to comment number 1085.</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>	<p>Thank you for your comment. Data and analyses collected and conducted in support of the Project would be included with the EIS data submittal.</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>	<p>Thank you for your comment regarding potential future mining activities in the Tamarack Intrusive Complex. Talon recognizes that cumulative impacts, including reasonably foreseeable future actions, are an important consideration for the EIS.</p> <p>The concept of "reasonably foreseeable" typically refers to activities that, while not currently proposed, are likely to. To be considered reasonably foreseeable, there must be a tangible basis—such as existing permits, formal plans, or documented intent by a project proponent or another entity—to suggest that such activities are more than speculative. Future discussion item, as necessary, in 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>	<p>Thank you for your comment. The EAW text and figure have been updated to include Savanna State Forest.</p>
1171	14.b	2079	Figure 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>	<p>Thank you for your comment and for noting the potential indirect impacts on wetlands and wildlife habitat from fragmentation, noise, pollution, light, odor, and changes to wetland hydrology. The Environmental Assessment Worksheet (EAW) question focuses on identifying and describing rare species, native plant communities, and other sensitive ecological resources within the project area based on existing data and surveys. Future discussion item, as necessary, in development of Draft Scoping Decision Document.</p>

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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>	<p>Thank you for your comment. Future discussion item, as necessary, in 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>	<p>Thank you for your comment and for highlighting the importance of considering indirect and long-term climate change impacts on natural resources. The EAW discusses anticipated short-term climate trends and their potential effects over the project's lifespan. However could extend beyond the immediate duration of project operations.</p> <p>As part of the EIS process, Talon will consider a longer time horizon for climate impact assessments, potentially extending to 25-50 years, to capture the broader ecological context. The language of the EAW was modified as follows:</p> <p>EAW October 2023 (as written)          "As discussed in EAW Question 7 (Climate Adaptation and Resilience), future climate trends in the area indicate that minimal temperature increases, and minimal precipitation decreases are anticipated by 2030. Given that Project operations are anticipated to last 7- to 10 -years, climate change coupled with the project development is anticipated to have little direct effect on fish and wildlife during this time. "</p> <p>EAW December 2024 (as modified)          "As discussed in Section 7.0 (Climate Adaptation and Resilience), future climate trends in the area indicate anticipated increases in temperature and variability in precipitation. Given the nature and anticipated duration of project operations, direct effects from climate change on fish and wildlife are expected to be limited. However, the Environmental Impact Statement (EIS) process would provide a more detailed assessment of potential indirect and cumulative climate impacts associated with the project.          [R2_Cmt#_1173]"</p>

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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>	<p>Thank you for your comments. The EAW for this section includes an evaluation of potential impacts on identified fish, wildlife, plant communities, and rare features, as requested. This includes discussion of project-related impacts on species such as lynx and wolf, as well as consideration of climate trends, invasive species, and direct effects on sensitive habitats.</p> <p>As part of the EIS scoping process, the RGU will determine the need for any further specific analyses or conclusions to comprehensively address potential effects on fish and wildlife resources.</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>	Please see the response to comment number 1174.
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>	Please see the response to comment number 1166.
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>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
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>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
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>	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
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>	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.



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				Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.	
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>	<p>Thank you for your comment regarding the rail line and its potential impacts on local populations of small mammals. While the rail line may affect small mammal movements, rail corridors can also create ecological benefits by providing green corridors that support wildlife connectivity. These areas can serve as movement pathways and safe travel corridors for small mammals and other species, helping to offset habitat fragmentation. The EIS will evaluate potential impacts of the rail line on small mammals.</p> <p>EAW October 2023 (as written) " A portion of the developed surface (excluding the railway spur) will be fenced, but there is ample adjacent undeveloped land available for wildlife to pass through."</p> <p>EAW December 2024 (as modified) "With the majority of the operations contained within the Ore Transfer Building, only a small portion of the developed surface will be fenced to control access to the site from CSAH 31 and to prevent access to the two ventilation pads. Wildlife would be able to freely move through the rest of the site, and there would also ample adjacent undeveloped land available for wildlife to pass through including along the rail spur. [R2_Cmt_#1181]Thank you for your comment and for highlighting the importance of considering indirect and long-term climate change impacts on natural resources. The EAW discusses anticipated short-term climate trends and their potential effects over the project's lifespan. However could extend beyond the immediate duration of project operations.</p> <p>As part of the EIS process, Talon will consider a longer time horizon for climate impact assessments, potentially extending to 25-50 years, to capture the broader ecological context. The language of the EAW was modified as follows:</p> <p>EAW October 2023 (as written) "As discussed in EAW Question 7 (Climate Adaptation and Resilience), future climate trends in the area indicate that minimal temperature increases, and minimal precipitation decreases are anticipated by 2030. Given that Project operations are anticipated to last 7- to 10 -years, climate change coupled with the project development is anticipated to have little direct effect on fish and wildlife during this time. "</p> <p>EAW December 2024 (as modified) "As discussed in Section 7.0 (Climate Adaptation and Resilience), future climate trends in the area indicate anticipated increases in temperature and variability in precipitation. Given the nature and</p>

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					<p>anticipated duration of project operations, direct effects from climate change on fish and wildlife are expected to be limited. However, the Environmental Impact Statement (EIS) process would provide a more detailed assessment of potential indirect and cumulative climate impacts associated with the project.</p> <p>[R2_Cmt#_1173]"Thank you for your comment and for highlighting the importance of considering indirect and long-term climate change impacts on natural resources. The EAW discusses anticipated short-term climate trends and their potential effects over the project's lifespan. However could extend beyond the immediate duration of project operations.</p> <p>As part of the EIS process, Talon will consider a longer time horizon for climate impact assessments, potentially extending to 25-50 years, to capture the broader ecological context. The language of the EAW was modified as follows:</p> <p>EAW October 2023 (as written) "As discussed in EAW Question 7 (Climate Adaptation and Resilience), future climate trends in the area indicate that minimal temperature increases, and minimal precipitation decreases are anticipated by 2030. Given that Project operations are anticipated to last 7- to 10 -years, climate change coupled with the project development is anticipated to have little direct effect on fish and wildlife during this time. "</p> <p>EAW December 2024 (as modified) "As discussed in Section 7.0 (Climate Adaptation and Resilience), future climate trends in the area indicate anticipated increases in temperature and variability in precipitation. Given the nature and anticipated duration of project operations, direct effects from climate change on fish and wildlife are expected to be limited. However, the Environmental Impact Statement (EIS) process would provide a more detailed assessment of potential indirect and cumulative climate impacts associated with the project. [R2_Cmt#_1173]"</p>

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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>	<p>Thank you for your comment. The following language was added to the EAW:</p> <p>EAW October 2023 (as written) "As noted above, direct impacts to aquatic biota are not anticipated because Project discharge would meet all applicable water quality standards. As noted above in EAW Item 17 (Air), the Fugitive Dust Control Plan would include measures to minimize impacts to ecological resources."</p> <p>EAW December 2024 (as modified) "The Tamarack Mining Project's design has been developed to minimize potential environmental impacts through comprehensive engineering and operational controls. Nearly all project activities will take place within a single enclosed building, with the exception of an outdoor CRF aggregate buffer. The site surface is primarily gravel, and all stormwater runoff will be managed to meet federal and state regulatory standards. To prevent sediment discharge, the project's stormwater management system is designed to capture runoff and route it through treatment processes that remove particulate material. Additionally, the ventilation systems for both the facility and the mine are engineered to control emissions through advanced filtration devices, reducing any potential airborne particulate matter from impacting surrounding areas. [R2_Cmt_#1182]"</p> <p>"The EIS would provide further details on these measures and ensure compliance with state and federal standards for protecting downstream habitats and sensitive resources. [R2_Cmt_#1183]"</p>
1183	14.c	2124		<p>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.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
1184	14	2131		<p>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.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
1185	15	2137		<p>Describe how the Project will coordinate with regional Tribal Historic Preservation Offices.</p> <p>Requested Action: Add text to address comment.</p>	<p>The EAW was edited as follows to address this comment.</p> <p>EAW December 2024 "Talon would coordinate with Tribal Historic Preservation Offices (THPOs) throughout the Environmental Impact Statement (EIS) and permitting process. Consultation would be initiated to identify potential cultural concerns, and ongoing engagement would ensure that THPOs have input on the studies and findings. [R2_Cmt_#1185]"</p>

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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.	Thank you for your comment. Talon acknowledges that cultural resource sites, such as the Savanna Portage State Park, exist in the same watershed as the Project. In consultation with the state and through the development of the Draft Scoping Decision Document (DSDD), the extent of the hydrological modeling will be determined. This will guide any necessary assessments to ensure that culturally significant sites are appropriately addressed.
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.	Thank you for your comment. Talon acknowledges that additional cultural research work and consultation with tribes will be needed for the development of the Draft Scoping Decision Document. Talon will coordinate with Tribal Historic Preservation Offices (THPOs) throughout the Environmental Impact Statement (EIS) and permitting process. Consultation will be initiated to identify potential cultural concerns, and ongoing engagement will ensure that THPOs have input on the studies and findings.
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.	The Project is committed to preserving cultural sites identified during these investigations and will adhere to best practices to avoid actions that could damage or destroy potential historical or sacred sites, such as bulldozing or concealing them. Any inadvertent discoveries will be handled with full respect for their cultural significance, in strict accordance with Section 106 guidelines.
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.	Thank you for your comment. The Environmental Assessment Worksheet (EAW) serves as the foundation for developing the project description necessary for scoping the Environmental Impact Statement (EIS). The EIS process is specifically designed to assess potential impacts on the landscape, including water quality, wildlife, cultural resources, and traditional land uses such as wild rice harvesting and fishing. Through this process, measures to avoid, minimize, mitigate, and manage potential degradation will be evaluated in detail.
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.	The EAW text was edited for consistency.  EAW October 2023 (as written) "Question 6(b)"  EAW December 2024 (as modified) Section 6.b. [R2_Cmt_#1190]
1191	16	2191		How is Savanna State Forest managed?  Requested Action: Answer question; modify text as warranted.	Thank you for your comment. Savanna State Forest is managed by the state with multiple-use goals, including recreation, timber production, and wildlife habitat, under the guidance of DNR practices. Could you please clarify the intent of this comment to help us address any specific considerations or alignments you have in mind for the project?

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1192	16	2191		<p>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..."</p> <p>Requested Action: Modify text to address comment.</p>	<p>EAW Oct 2023 "The Project's eastern boundary borders the Savanna State Forest and consists of a mixture of wetlands, lowland conifers and lowland deciduous tree types that help protect the aesthetic quality of the landscape."</p> <p>EAW December 2024 "The scope of the Project Area extends eastward away from the Surface Boundary of the mine layout and into the Savanna State Forest, providing a gradual transition from a small scale industrial facility into a natural landscape of a mixture of wetlands, lowland conifers and lowland deciduous tree types that help protect the aesthetic quality of the landscape. Young to middle-aged coniferous and deciduous tree types provide a natural buffer along the stretch of CSAH 31 that runs adjacent to the Project's western property boundary. There are no scenic vistas within or near the Project Area that require special attention regarding adverse visual impacts. [R2_Cmt_#1192]"</p>
1193	16	2201		<p>For consistency with the rest of the EAW, reference "Question 6(b)" as "Question 6.b".</p> <p>Requested Action: Modify text to address comment.</p>	<p>The EAW text was edited for consistency.</p> <p>EAW October 2023 (as written) "Question 6(b)"</p> <p>EAW December 2024 (as modified) Section 6.b. [R2_Cmt_#1193]</p>
1194	16	2201		<p>This does not discuss effects of continuous operation on wild rice harvesting, fishing, hunting, recreation, local residents.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your comment. This is a future discussion item, as necessary, in development of DSDD.</p>
1195	16	2206		<p>For consistency with the rest of the EAW, reference "Question 6(b)" as "Question 6.b".</p> <p>Requested Action: Modify text to address comment.</p>	<p>The EAW text was edited for consistency.</p> <p>EAW October 2023 (as written) "Question 6(b)"</p> <p>EAW December 2024 (as modified) 6.b. [R2_Cmt_#1195]</p>
1196	16	2209		<p>Visual impacts from Savanna Portage State Park should be evaluated for impacts to Dark Skies and mitigations made if necessary</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for your comment. The EAW has been edited to include this text:</p> <p>EAW December 2024 "Several miles to the northwest of the Project is the Savanna State Portage Park and despite the nearby communities of Floodwood and the lake house communities around Big Sandy Lake, Minnewawa Lake, and Round Lake—generating light pollution, the Park is known for its natural night-sky viewing experience. Given the existing sources of light pollution, as well as the Project's enclosed operations design, minimized outdoor nighttime activity, and intention to employ dark-sky-compliant lighting practices, it is unlikely that that the project would significantly alter the current night-sky quality in the park. [R2_Cmt_#1196]"</p>

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1197	16	2213		<p>How would the Project affect the Bortle Dark Sky rating? What standards does the Proposer propose to meet?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for your comment. While there are no specific Minnesota standards for dark skies as detailed in the EAW, some of the controls the Project plans to incorporate into the design, include but are not limited to: aiming floodlights down, fully shielding light fixtures to emit light only below the horizon, using vegetation to screen light sources, using the minimum level of illumination necessary, using lighting controls such as motion sensors, and using wildlife friendly light colors such as amber, orange or red lighting where possible. The Project is exploring options to avoid, mitigate, and manage dark-sky impacts, while also providing a safe work environment for employees and on site operations.</p> <p>The EAW has been edited to include this text:</p> <p>"While there is no specific Minnesota standard for dark skies, the Project is also working to include Bureau of Land Management guidance for lighting and dark sky compliant lights in the design (Sullivan, 2021) [R2_Cmt_#1197]."</p>
1198	16	2222		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Thank you for your comment. This is a future discussion item, as necessary, in development of DSDD.</p>
1199	17	2247		<p>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.</p> <p>Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.</p>	<p>Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).</p>
1200	17.a	2257		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment. Talon acknowledges the importance of a comprehensive Hazardous Air Pollutant (HAP) analysis. For the purposes of scoping, the EAW provides a general overview of emissions controls. A detailed analysis, including both total and individual HAPs, as well as materials characterization and the anticipated efficacy of control measures, will be provided in the Environmental Impact Statement (EIS).</p>
1201	17.a	2260		<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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
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>Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).</p>

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				Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.	
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>	Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).
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>	<p>Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).</p> <p>It is important to note that the configuration used to load railcars does not necessitate changes to the blasting pattern.</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>	<p>Thank you for the comment. It appears that the reference for this comment may have been directed to the wrong section of the Environmental Assessment Worksheet (EAW). Talon requests clarification regarding the appropriate section to ensure the relevant details are reviewed.</p> <p>Regarding the ore storage and loading, the Project Description section of the EAW provides details on the storage and loading processes. As part of the amended design, the project has updated the configuration for ore and waste rock handling. The footprint, height, and location of the storage facilities, as well as other design details such as flooring and duration of storage, will be further detailed in the Environmental Impact Statement (EIS) data submittal.</p>

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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>	<p>Thank you for the comment. Additional details regarding ore storage and transfer to railcars were provided in the Project Description.</p> <p>1) Ore Unloading and Storage: Ore unloading for storage will take place within an enclosed building. This facility is equipped with exhaust air scrubbers or fabric filters designed to prevent dust and particles from escaping, ensuring effective dust management throughout the unloading process.</p> <p>2) Ore Transfer to Railcars: The ore will also be transferred to railcars within this enclosed facility to minimize dust emissions and manage particulates during loading.</p> <p>Processing Explanation: The reference to "processing" simply indicates that the ore will be sent off-site for further processing after transport.</p> <p>The EAW text was edited for clarity.</p> <p>EAW October 2023 (as written) "Ore would be transferred from the trucks to covered storage areas for staging and then to railcars for additional processing."</p> <p>EAW December 2024 (as modified) "Aboveground, several sources would exhaust through stacks. Ore would be transferred from the trucks to the ore transfer area within the Ore Transfer Building and then into railcars for shipping. At no time during this process would the ore be exposed to the outdoors. [R2_Cmt_#1206]"</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>	<p>Thank you for the comment. It appears that the reference to this comment may have been directed to the wrong section of the Environmental Assessment Worksheet (EAW), specifically the air section, where the details referenced are not found. Talon requests clarification regarding the appropriate section to ensure that the relevant information is reviewed.</p> <p>As for the characterization of waste rock, it is important to note that waste rock is part of the ongoing material characterization program. Additionally, the waste rock storage has been updated in the project design, and it is now inside (covered), to mitigate potential environmental impacts, including fugitive particulates.</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>	<p>Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).</p>



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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>	<p>Thank you for the comment.</p> <p>The Project made the determination as to a PSD permit, 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>EAW October 2023 (as written) "The Project expects that Prevention of Significant Deterioration construction permitting requirements would not be triggered, but that either an individual state or Title V facility air permit would be needed for the facility."</p> <p>EAW December 2024 (as modified) "Based on the Project's scope and scale, similar to the Eagle Mine in Michigan, which did not trigger Prevention of Significant Deterioration (PSD) review, the Project anticipates that PSD requirements will not apply, but an individual state or Title V air permit will be required. [R2_Cmt_#1209]"</p> <p>As for Class I areas the EAW has been edited as follows:</p> <p>EAW October 2023 (as written) "To support EIS development, the Project would conduct a modeling analysis for the Class I areas near the Project Area that may include an initial screening, an increment analysis, and particle transport modeling analysis."</p> <p>EAW December 2024 (as modified) "To support the EIS development, modeling analysis for all federally approved Class I areas within 200 km (Figure 23) of the Project Area will be conducted. This may include an initial screening, a significant impact analysis, and a particle transport modeling analysis to assess potential project impacts on these areas. (R2_Cmt_#696]"</p>
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>	<p>Thank you for the comment regarding the regulatory oversight for crushing waste rock. Talon understands the importance of adhering to the correct regulatory framework. In this case, waste rock intended for use in backfill is not subject to 40 CFR Part 60, Subpart LL, which governs metallic mineral processing. Rather, it would likely fall under the scope of 40 CFR Part 60, Subpart OOO, as the material is not being processed to recover metals.</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>	<p>Thank you for the comment. The Environmental Assessment Worksheet (EAW), in the Project Description (Question 6) did include a discussion of the Project's energy needs and the timing for the introduction of generators while the transmission system tie-in and substation are being constructed. The EAW also details the peak and average electrical needs for the project. Talon intends to commence construction with available power and/or if needed generators until the necessary energy infrastructure, including substations and transmission lines, would be in place.</p>

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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>	<p>Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).</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>	<p>Thank you for the comments. The current focus is the development of the project description, and the EAW contains sufficient information for scoping the Environmental Impact Statement (EIS), which will involve a more detailed evaluation of potential impacts.</p> <p>The EIS will outline the anticipated emissions sources and the general assumptions regarding emissions controls. The air permitting process will then finalize the analysis by determining compliance with Title V and HAP thresholds, providing the necessary technical details on emission sources, control technologies, and their effectiveness.</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>	<p>Thank you for the comments. The current focus is the development of the project description, and the EAW contains sufficient information for scoping the Environmental Impact Statement (EIS), which will involve a more detailed evaluation of potential impacts.</p> <p>Regarding mercury emissions, the material characterization and broad assumptions about fuel combustion sources will be included in the EIS. This will cover general information on potential emissions and the predicted efficacy of control measures that will be applied to limit pollutants, including mercury. However, more specific assumptions, such as the full inventory of fuel sources and detailed emissions calculations, will be evaluated during the air permitting process, where precise estimates of emissions will be calculated based on finalized designs and selected control technologies.</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>	<p>Thank you for your comment. A map has been included in the EAW to visually represent the proximity of Class I areas for reference.</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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>

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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>	<p>Your comment is acknowledged. In the initial design (EAW June 2023), fugitive dust generated from waste rock in designated contact areas would have been managed with control measures to minimize potential water contamination. Contact water would have been treated before release. However, with the revised design (EAW December 2024), outdoor stockpiles of mine waste rock have been removed, and the open footprint has been enclosed, thereby eliminating any potential sources of fugitive dust from mine waste rock or ore. This change ensures that dust from these materials will not impact water quality, as there is now no source of fugitive dust from these materials.</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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
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>	<p>Thank you for the comment. It is important to clarify that the project is undergoing a comprehensive material characterization program, which includes the analysis of both waste rock and overburden to assess their chemical composition. The characterization will provide detailed information about the presence of sulfate and metals, which is necessary before making any determinations regarding their potential for toxicity.</p> <p>Regarding concerns over fugitive dust emissions, Talon would like to emphasize that waste rock is no longer being stored outside. Instead, it will be housed within an enclosed building, with all emissions routed through engineered controls, eliminating the potential for fugitive emissions from these materials. Additionally, the overburden will be disposed of off-site, further minimizing on-site particulate emissions.</p> <p>Finally, particulate emissions from the use of aggregate, such as for Cemented Rockfill (CRF) and road materials, will be mitigated through the project's Fugitive Dust Control Plan, which includes measures such as visible emissions checks, dust suppressants, and water sprays.</p> <p>The text of the EAW was edited as follows:</p> <p>EAW October 2023 (as written)  "Aboveground paved and unpaved roads at the Project Area would produce fugitive particulate emissions. Aggregate may be received and stored for use as both CRF and unpaved roadbeds. The transfer and outdoor storage of aggregate material would produce particulate emissions. The act of road grading would be used to maintain unpaved roads and it will produce particulate emissions.</p> <p>Class 2 development rock would be transferred to the backfill material storage area and stored outdoors. The aggregate or development rock would be mixed with additional backfill materials for transfer back to the underground mine.</p> <p>The Project Area may also store excavated surface overburden and</p>

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					<p>construction-related materials in piles. Storage piles would produce fugitive particulate emissions from wind erosion and material transfer.</p> <p>Talon's The Project's Fugitive Dust Control Plan would include visible emissions checks with mitigation measures in place if emissions are observed. Mitigation measures may include sweeping and spraying of paved surfaces, dust suppressants and water sprays on unpaved surfaces, wind barriers for piles, and water sprays or the use of vegetation."</p> <p>EAW December 2024 (as modified) "Fugitive particulate emissions at the Project Area could originate from aboveground paved and unpaved roads. Commercially sourced aggregate may be received and stored outdoors for use in cemented rockfill and as material for unpaved roadbeds. The transfer and outdoor storage of aggregate material could produce particulate emissions. Additionally, the grading of unpaved roads to maintain the surface could generate particulate emissions.</p> <p>The Project's Fugitive Dust Control Plan would include visible emissions checks with mitigation measures in place if emissions are observed. Mitigation measures may include sweeping and spraying of paved surfaces, dust suppressants and water sprays on unpaved surfaces, wind barriers for piles, and water sprays or the use of vegetation. [R2_Cmt_#1220] "</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
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>	<p>Your comment is acknowledged. Explosives used in the project will be entirely enclosed within the mine, with exhaust air directed through a wet scrubber system, which is expected to minimize odors. Additionally, diesel exhaust emissions from non-electric vehicles will be limited to Tier 4 certified engines, further reducing potential odor impacts. With much of the project activity now occurring within enclosed areas, odors are expected to be minimal, temporary, and confined to the immediate project vicinity.</p> <p>The text of the EAW was edited as follows:</p> <p>EAW October 2023 (as written)  "Use of explosives and diesel trucks, if necessary, are expected to be the primary sources of odors associated with the Project. Explosives have a distinctive smell that may be detectable in the area immediately surrounding the Project Area. Talon The Project expects to blast daily, and the associated emissions would not be expected to last more than an hour. Diesel engines are recognized odor sources; however electric vehicles would be used if available. All nonelectric vehicles would be EPA Tier 4 certified engines if available. The diesel exhaust fluid and particulate filters used with Tier 4 engines are expected to reduce odors. Underground tailpipe emissions would exhaust via the mine ventilation, and surface tailpipe emissions would exhaust near ground level. "</p> <p>EAW December 2024 (as modified)  "Use of explosives and diesel trucks, if necessary, are expected to be the primary sources of odors associated with the Project. Explosives use would be entirely enclosed within the mine, and exhaust air from blasting would pass through a wet scrubber system expected to help minimize odors. Blasting is expected to occur daily, with associated emissions anticipated to dissipate within an hour. Diesel engines are recognized odor sources; however, electric vehicles would be used if available, and all non-electric vehicles would use EPA Tier 4 certified engines if available. The diesel exhaust fluid and particulate filters in Tier 4 engines are expected to further reduce odors. Underground tailpipe emissions would be vented through the mine ventilation system, while surface tailpipe emissions would exhaust near ground level. With much of the Project activity now occurring indoors or in enclosed areas, odors are expected to be minimal, temporary, and localized to the immediate project vicinity. [R2_Cmt_#1221] "</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>	<p>Comment is noted. The Project will address this question, as necessary, in the EIS data submittal.</p>

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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>	<p>Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).</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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
1225	18.a	2366		<p>Change "off-road" to "non-road".</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for the comment. The EAW has been edited accordingly.</p> <p>EAW October 2023 (as written) "GHG emissions from construction activities would include both on- and off-road mobile equipment, land use change, and potential electrical consumption."</p> <p>EAW December 2024 (as modified) "GHG emissions from construction activities would include both on-road and non-road [R2_Cmt_#1226] mobile equipment (e.g., diesel-, gasoline-, propane-, natural gas-powered) [R2_Cmt_#704], use change, and potential electrical consumption. [R2_Cmt_#1225]"</p>
1226	18.a	2377		<p>Change "Off Road" to "Non-road".</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for the comment. The EAW has been edited accordingly.</p> <p>EAW October 2023 (as written) "Off Road"</p> <p>EAW December 2024 (as modified) "Non-Road [R2_Cmt_#1226]"</p>
1227	18.a	2377	Table 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>	<p>Thank you for the comment. Talon recognizes that climate conditions in Minnesota, including colder temperatures, may influence fuel consumption and, consequently, emission calculations compared to those used by the South Coast Air Quality Management District (SCAQMD). Talon proposed a calculation method in the EAW based on established EPA and SCAQMD emission factors for consistency. If the state has a specific calculation method it would prefer, Talon would appreciate any guidance to ensure alignment with Minnesota's standards.</p>
1228	18.a	2377	Table 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>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
1229	18.a	2382	Table 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>	<p>Thank you for the comment. The 2013 IPCC Wetlands Supplement provides guidance on estimating greenhouse gas (GHG) emissions and removals from wetlands, particularly focusing on direct impacts related to land-use changes, wetland conversion, or management practices. However, the supplement does not explicitly address potential carbon sequestration impacts from indirect wetland impacts. The methods are primarily aimed at assessing GHG emissions from activities that directly modify the wetland's physical structure or hydrological regime.</p> <p>In the context to the Project, the overall direct wetland impact is expected to be small primarily due to the linear corridor for rail access in the design. Furthermore, the corridor is being designed to maintain hydrological conductivity between both sides of the linear feature, reducing the likelihood of significant indirect impacts on adjacent wetland areas. Given the relatively small direct impact area and the mitigation measures in place to ensure continued hydrological function, the overall GHG impact related to indirect wetland effects is likely to be low.</p> <p>The proportional nature of the impact does not warrant a complex modeling effort for indirect carbon sequestration losses. Instead, the Project would rely on reasonable assumptions based on hydrological design and established best practices to minimize both direct and indirect environmental impacts. Furthermore, the mine design would minimize the potential indirect effects on wetlands (e.g. underground mine with 100 to 150 ft thick quaternary and 200 ft thick bedrock between top of bedrock and shallowest depth to mining versus an open pit mine) and their role in carbon sequestration.</p>
1230	18.a	2382	Table 16	<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>	<p>Please see the response to comment number 1227.</p>
1231	18	2391		<p>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.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
1232	18.b.i	2392		<p>Mitigation measures identified are minor and indefinite, e.g. use of green electricity and electric vehicles "if available and appropriate"</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment. Talon appreciates your input and will conduct a thorough evaluation of greenhouse gas mitigation measures, including electricity consumption and green energy options, in the Environmental Impact Statement (EIS).</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
1233	18.b.i	2392		<p>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?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for the comment. Carbon sequestration into bedrock has never been proposed for the Tamarack Mining Project (TMP), and there are no plans to pursue this option as part of the project.</p>
1234	18.b.i	2396		<p>How does "maximizing the use of uncemented rockfill" reduce GHG? What are consequences in terms of strength, subsidence, fugitive emissions, and/or seepage?</p> <p>Requested Action: Answer questions; modify text as warranted.</p>	<p>Thank you for the comment. By maximizing the use of uncemented rockfill, the project reduces the amount of cement required, which in turn lowers the overall greenhouse gas (GHG) emissions. Cement production is energy-intensive and a notable source of GHG emissions, so minimizing its use contributes directly to reducing the project's carbon footprint.</p> <p>The considerations of strength, subsidence, fugitive emissions, and seepage associated with uncemented rockfill will be further evaluated as part of the Environmental Impact Statement (EIS) to ensure all potential impacts are thoroughly assessed.</p>
1235	18.b.i	2400		<p>Change "off-road" to "non-road".</p> <p>Requested Action: Modify text to address comment.</p>	<p>Thank you for the comment. The EAW has been edited accordingly.</p> <p>EAW October 2023 (as written) "Reduce use of off-road mobile construction equipment;"</p> <p>EAW December 2024 (as modified) "Reduce use of non-road mobile construction equipment;"</p>
1236	19	2423		<p>The EAW should acknowledge that the EIS will provide analyses on impacts of noise, vibrations, and air blasting on workers.</p> <p>Requested Action: Add text to address comment.</p>	<p>Thank you for the comment. The project design will comply with the Mine Safety and Health Administration (MSHA) regulations, which provide standards and guidance for protecting miners from potential impacts related to noise, vibrations, and air blasting. MSHA regulations include permissible exposure limits, monitoring, and engineering controls aimed at safeguarding worker health and safety. Compliance with these standards will address concerns regarding potential impacts on workers.</p>
1237	19	2423		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Please see the response to comment number 734.</p>



Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
1238	19	2423		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment. The Environmental Impact Statement (EIS) will include baseline data on existing decibel levels, capturing variations by time of day, to establish pre-construction conditions. The EIS will also provide a comprehensive analysis of potential 24/7 noise impacts from the project. With the revised design (EAW December 2024) submitted in the most recent EAW, much of the operations will now be held indoors, further attenuating generated noise and reducing potential impacts on the surrounding environment. The following additions were made to the EAW:</p> <p>EAW December 2024          "These rules are based on statistical calculations that quantify noise levels over a one-hour monitoring period. The L10 calculation is the noise level that is exceeded for 10 percent, or 6 minutes, of the hour, and the L50 calculation is the noise level exceeded for 50 percent, or 30 minutes, of the hour. There is no limit on maximum noise. The statutory limits for a residential location are L10 = 65 dBA and L50 = 60 dBA during the daytime (7:00a.m.–10:00p.m.) and L10 = 55 dBA and L50 = 50 dBA during the nighttime (10:00p.m.–7:00a.m.) (Minn. R. 7030.0040). This means that during the one-hour period of monitoring, daytime noise levels cannot exceed 65 dBA for more than 10 percent of the time or 60dBA more than 50 percent of the time.          Noise area classifications (NAC) are based on the land use at the location of the person who hears the noise (Table 19.1), which does not always correspond with the zoning of an area. Therefore, noise from an industrial facility near a residential area is held to the NAC 1 standards if it can be heard on a residential property.          [R2_cmt_#1238]"</p> <p>"With surface infrastructure enclosed within a single building, noise pollution from operational activities should be significantly attenuated. The enclosure of key noise-generating components, such as surface haulage and the maintenance shop, would further reduce the amount of noise escaping to the environment, thus enhancing overall noise mitigation and reducing potential impacts to nearby sensitive receptors. [R2_Cmt_#118] [R2_Cmt_#1239]"</p> <p>"Blasting vibrations would primarily be propagated through the bedrock and surrounding materials. Given that the blasting is unlikely to occur less than 100 ft (30.5 m) below the surface in bedrock during construction (see section 6.5.2), the bedrock and the overburden would act as an attenuator, dissipating the energy of the vibrations over distance. [R2_Cmt_#821] When in operations, there would be no blasting above 300 ft (91.4 m)350 ft (107 m) below the surface in bedrock. Blasting activities would be subject to Minnesota Rules, part 6132.2900, subpart 2. Vibration modeling would be conducted to simulate the propagation of blast-induced vibrations to predict the impact at nearby sensitive receptors, such as residences. This information would be provided in the EIS. [R2_Cmt_#72] [R2_Cmt_#73] [R2_Cmt_#95] [R2_Cmt_#107] [R2_Cmt_#108] [R2_Cmt_#110] [R2_Cmt_#733]</p> <p>The vibration limits set forth in the regulations are designed to prevent structural damage to buildings and other infrastructure. By</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
					adhering to the peak particle velocity limit threshold and using blasting techniques designed to remain within these PPV limits, vibrations would be kept at levels that do not pose a risk to the integrity of nearby structures. [R2_Cmt_#1239]"
1239	19	2456		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment. Updated estimates for rail frequency indicate that, with an optimal payload of 105 metric tons per railcar, each 120-car unit train would haul approximately 12,600 metric tons. At the projected mine rate of up to 3,000 metric tons per day, BNSF would need to exchange train sets roughly every 4.1 days, resulting in about 90 unit trains per year, totaling approximately 1.1 million metric tons annually. Further analysis on other aspects of rail transportation, including potential impacts on rail congestion and interactions with other transportation modes, will be provided as part of the EIS data submittal.</p>

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
1240	20	2463		Change "MDOT" to "MnDOT".  Requested Action: Modify text to address comment.	Thank you for the clarification. The EAW was edited accordingly.  EAW October 2023 (as written) The MDOT traffic mapping application was used to assess annual average daily traffic, a measure of baseline traffic conditions, in vicinity of the Project Area (reference (59)).  EAW December 2024 (as modified) The MnDOT [R2_Cmt_#1240] traffic mapping application was used to assess annual average daily traffic, a measure of baseline traffic conditions, in vicinity of the Project Area (MDOT, 2022).
1241	20.a	2464		Change "MDOT" to "MnDOT".  Requested Action: Modify text to address comment.	Thank you for the clarification. The EAW was edited accordingly.  EAW October 2023 (as written) According to MDOT, the 2021 annual average daily traffic volume was 223 daily trips along CSAH 31 and 474 daily trips along County Highway 6;  EAW December 2024 (as modified) According to MnDOT, [R2_Cmt_#1241] the 2021 annual average daily traffic volume was 223 daily trips along CSAH 31 and 474 daily trips along County Highway 6;
1242	20.a	2486		Traffic impact study does not reference rail.  Requested Action: Consider comment; add text about rail.	Talon appreciates the observation regarding the inclusion of rail in the traffic impact study. Rail transportation has been considered as part of the regional transportation system. The EAW has been revised to explicitly state the inclusion of rail.  The EAW was edited as follows:  "A traffic impact study would be conducted to further assess the Project's impact on the regional transportation system (roadways and railways) [R2_Cmt_#1242] and the need for roadway improvements to accommodate Project traffic and minimize congestion on local roads; the results would be provided for the EIS."
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.	Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).

Comment No.	EAW Section	EAW v2 Starting Line No.	Table; Figure; Graphic	Round 2 Comment and RGU Request 02/04/2024	Talon Response and Treatment in EAW 12/12/2024
1244	21	2501		<p>At a minimum, water quality impacts from existing industries including peat mining operations nearby must be considered.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for your comment. Talon acknowledges that cumulative potential effects are an important consideration in the environmental review process. Talon has indicated, in the EAW, activities near the project that it believes should be incorporated into this review.</p> <p>The following edit was made to the EAW to acknowledge that there are existing activities that may need to be considered in the evaluation:</p> <p>"The baseline environmental conditions for the Project reflect the combined impacts of past and present activities within the region, such as forestry, peat mining, transportation infrastructure, lake house communities, towns and cities, and agricultural use. These conditions form the foundation for evaluating the potential cumulative effects of the Project in combination with other existing and foreseeable actions. The EIS would assess impacts of the Project, layered onto this established baseline, to determine potential new cumulative effects that may arise from the interaction of the Project with other environmental factors. [R2_CMT_#1244]"</p>
1245	21.a	2509		<p>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.</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Comment is noted.</p>
1246	21.a	2516		<p>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.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
1247	21.b	2519		<p>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.</p> <p>Requested Action: Advisory only.</p>	<p>Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.</p>
1248	21.b	2524		<p>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."</p> <p>Requested Action: Consider comment; modify text as warranted.</p>	<p>Thank you for the comment. The term "known" in the EAW reflects the current, concrete understanding of nearby projects, as no additional projects are reasonably foreseeable at this time beyond Premier Horticulture. Talon will continue to monitor for any projects that become reasonably foreseeable and could contribute to cumulative impacts, should new information arise.</p>

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1249	21.b	2532		<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>	<p>Thank you for the comment. A reference to "potential cumulative impacts" was not found in Section 21.b.</p>
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>	<p>Thank you for the comment. The EAW has been edited accordingly.</p> <p>EAW October 2023 (as written) "The EIS will evaluate these potential cumulative impacts to ensure the Project is environmentally sustainable and socially responsible."</p> <p>EAW December 2024 (as modified) "The EIS would evaluate these cumulative potential effects to ensure the Project is environmentally sustainable and socially responsible. [R2_Cmt_#1250]"</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 <sub>2</sub>	Carbon Dioxide
CO <sub>2</sub> 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 <sub>2</sub> 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
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