DEPARTMENT OF NATURAL RESOURCES

Tamarack Mining Project EIS Scoping

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

On June 23, 2025, 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 three tables include comments made during each round of RGU review*. The Round One Comment Response Table includes the RGU's comment from the initial submittal, Talon's response submitted October 11, 2023, the RGU's follow up comments, Talon's response submitted December 12, 2024, the RGU's follow up comments, and Talon's response submitted June 23, 2025. The Round Two Comment Response Table includes new comments from the second submittal, Talon's responses submitted December 12, 2024, the RGU's follow up comments, and Talon's response submitted June 23, 2025. The Round Three New Comments Table includes the DNR's new comments on the third submittal and Talon's response submitted June 23, 2025. A list of abbreviations and acronyms is provided after the tables

*After reviewing the third submittal, some members of the DNR's review team retracted comments from previous rounds in favor of putting focus on the latest submittal. For this reason, you will notice some comment numbers will be missing. These comments are still available on previous comments table postings on the Project website.

Round One Comment Response Table

Comment ID	EAW Item	EAW v1 Line No.	Round 1 RGU Comment and Requested Action 09/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 RGU Response and Requested Action 02/04/2024	Talon Response and Treatment in EAW 12/12/2024	Round 3 RGU Response and Requested Action 04/10/2025	Talon Response and Treatment in EAW 06/23/2025
4	5	100	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.	Resolved. Requested Action: None.	
5	5	103	Figure 4. The figure would benefit from addition of a few of the larger, basic facility labels so the reader does not have bounce between other figures to determine where drainage may be impacted. Requested Action: Edit figure as noted.	Figure 4 has been updated.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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6	5	107	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
8	List of Abbreviations	121	The list of acronyms needs to add Tribal Historic Preservation Officer (THPO), Minnesota Indian Affairs Commission (MIAC), National Register of Historic Places (NRHP), Traditional Cultural Properties (TCP), National Historic Preservation Act (NHPA), Minnesota Field Archaeology Act	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.	Resolved. Requested Action: None.	

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			(MFAA). Requested Action: Address comment; modify text if warranted.					
11	6.a	178	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. Requested Action: Modify text.	Numerous lines in the document have been updated to specify the proposed processing location as being in Mercer County, North Dakota.	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.	Resolved. Requested Action: None.	
12	6.b	178	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. Requested Action: Modify text; future discussion item if desired.	The text under the “Project Ownership Status” heading has been revised to include additional detail as follows: 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”). 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).	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.	Resolved. Requested Action: None.	

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				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.				
23	6.b	187	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. Requested Action: Consider comment; edit text.	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.	Resolved. Requested Action: None.	
25	6.b	196	The surface facilities outlines in Graphic 1 do not appear to be consistent with the "surface boundary" in Figures 1 or 2. Confirm consistency. Requested Action: Consider comment; edit figure as warranted.	Graphic 1 was modified to align better with Figures 1 and 2. As stated in the EAW “an offset distance of at approximately 200 feet has been applied between the extent of the developed surface and the project boundary (with variability as appropriate to align with public roadways, certainty property boundaries, and other project features). “	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	

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26	6.b	196	It is not clear how the outline of the areas represented on Graphic 1 is correspond to the outline on Figure 2. Confirm consistency. Requested Action: Consider comment; edit figure as warranted.	See Response to Comment #25.	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	
27	6.b	196	Graphic 1 needs a legend to distinguish above ground and underground components/areas. Also, should reorient the map, with the north at the top of the page as with the other figures Requested Action: Consider comment; edit figure as warranted.	Graphic updated as requested. The dark blue polygons show the surface projection of the underground mine workings as they relate to the surface facilities.	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	
28	6.b	200	The project full area (Black outline in Figure 1) is not mentioned within the document. The processing area is stated as 447 acres, but the full site area is closer to 600 acres (from google earth estimations). This would be valuable information to include. Requested Action: Consider comment; edit figure as warranted.	The Project outline on Figure 1, labeled "Project Area" is defined in the EAW as "The project area is defined by the surface boundary and the underground boundary areas, as shown on Figure 2, and together comprise 447.0 acres."	Resolved. Requested Action: None.	The amended EAW maintains the intent of the original response, but now in context to the amended design.	Resolved. Requested Action: None.	
29	6.b	200	The identified 'facility elements' within the EIS Scoping Document do not match the names used on Figure 3. For clarity the same names/identifiers should be used throughout the document and match what is used within the Figures. Example: Cemented Backfill Plant vs Backfill Materials Crusher Building? Enclosed Ore Storage and Railcar Loadout Building = Ore Receiving Building?; Stormwater Wet Sediment Basin = Storm Water Pond?; Glacial Till is not identified on Figure 3 but it is called out in line 233. Requested Action: Consider comment; edit figure and/or text as warranted.	The Project has standardized terminology across graphics, figures, F37tables, and texts.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
32	6.b	204	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
35	6.b	216	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. Requested Action: Consider comment; edit document as needed.	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). 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.	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.	Resolved. Requested Action: None.	
36	6.b	217	The extraction timeline should be better defined. Is the 7–10-year period expected to be contiguous or potentially 7-10 years staggered over a larger time period (e.g. based on market demand)? Requested Action: Answer question; modify text if warranted.	The Project expects the operation to be continuous, though the exact duration of mine life would be 7- to 10-years, depending on results of ongoing studies such as rate of production ramp-up and estimated production costs.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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37	6.b	217	Provide greater details on the duration of the entire mine life, including a description of mine life phases and in what year each phase is anticipated to begin. The Project Description only states the length of the operations period but not closure or post-closure. Some reclamation activities are mentioned in later sections of the EAW. How would water, stockpiles, and discharge be managed in closure and during periods of care and maintenance? This information is being requested for inclusion in the next data submittal. Requested Action: Consider comment; edit document as needed.	Talon Metals has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to meet the requirements of the EIS scope.	Follow Up - A description of mine life phases at a high level is important to the overall project understanding. Identifying potential significant environmental issues requires knowledge of mine phase duration in the EAW. Please include an outline and timeline of the different phases of mine life in the next revision (line 284). Requested Action: Modify text to address comment.	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 are 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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
38	6	218	What are the North Dakota project components? What metal concentrate products are planned to be produced? Requested Action: Answer questions.	Activities at the out-of-state processing facility located in Mercer County, North Dakota will include crushing, grinding, flotation for metals recovery, tailings storage, and concentrate preparation/handling. There will also be rail facilities for receiving inbound shipments of ore and sending outbound shipment of concentrate products. The concentrate products will be a copper concentrate and a nickel concentrate. The iron byproduct is contained within the nickel concentrate.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
39	6.b	222	Include the Temporary Modular Water Treatment plant as a facility element Requested Action: Consider comment; edit document as needed.	Comment is noted. The facility elements listed in the Project Overview and shown in Figure 3 are the structures necessary for the long-term operation of the mine, not the temporary facilities used during the construction phase.	Follow up – The proposer is encouraged to provide site layout figures of the different phases of construction, including the temporary modular water treatment plant. Requested Action: Modify text to address comment.	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)	Unresolved - Please clarify if temporary modular water treatment units are still planned for construction water. It is unclear how construction water will be treated and managed. Requested Action: Modify EAW to address comment.	

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40	6.b	227	Bullet 3, Line 4: '… an offset distance of at approximately…' should read '… an offset distance of approximately…' Requested Action: Consider comment; edit document as needed.	See Response to Comment #34.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
41	6.b	229	There appear to be multiple separate treatment plants needed for the site: contact water, non-potable water, potable water, & sanitary treatment (in addition to ISW treatment). These may each generate their own waste streams (RO reject, filter backwash solids, sludge, etc..). information on these systems will need to be substantially expanded for the EIS. Requested Action: Advisory only. Level of detail to be determined 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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
42	6.b	238	More detail relative to railcar handling and localized environmental impacts is needed in the EIS. Requested Action: Advisory only. Level of detail to be determined for the Draft Scoping Decision Document.	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.	Resolved. Requested Action: None.	
43	6.b	238	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. 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.	The Project will address this question, as necessary, in the EIS. In the meantime, Figure 3 in the EAW includes a graphic representation of the buildings, page 19 provides some description of operations in the buildings, Table 3 indicates approximate square footage of the buildings.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	In light of the amended design Talon has updated the descriptions of ore storage and rail loadout areas to align with the new design.	Resolved. Requested Action: None.	

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45	6.b	245	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). Requested Action: Consider comment; edit document.	See Response to Comment #46	Follow up. Will season be considered in project activity timelines? Especially as peatlands can be more or less sensitive to impacts depending on season? Requested Action: Answer question; modify text as warranted.	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.	Resolved. Requested Action: None.	
46	6.b	245	Provide estimated years/months for construction. Requested Action: Consider comment; edit document.	Please reference lines 245-248 of the original Project Description submission for brief description of proposed project timeline. Currently, no further information is available regarding construction schedule, duration, or seasonality.	It is understood that uncertainty could be present around the construction schedule at this stage. RGU notes the FSD will require a construction schedule that allows for comparison of potential project effects across various project elements. Temporal sequencing of project elements is needed to understand potential overlapping impacts for potential significance. The eventual Project Description needed for the EIS Preparation Phase should provide this information. Requested Action: Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Resolved. Requested Action: None.	

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47	6.b	249	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. Requested Action: Consider comment; edit document.	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." 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"	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.	Resolved. Requested Action: None.	
48	6.b	249	Confirm if there is a need for any blasting at or near the surface. If so, include in construction plans. Requested Action: Consider comment; edit document.	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.	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.	Resolved. Requested Action: None.	
49	6.b	256	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. Requested Action: Advisory only; treatment of topic to be captured in 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.	Resolved. Requested Action: None.	

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50	6.b	259	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. Requested Action: Consider comment; edit text with additional detail for clarity, including new construction figures.	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.	Resolved. Requested Action: None.	
51	6.b	259	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. Requested Action: Consider comment; edit text with additional detail for clarity, including new construction figures.	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.	Resolved. Requested Action: None.	
52	6.b	259	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. Requested Action: Consider comment; edit text with additional detail for clarity.	Comment is noted. 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." 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 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]"	Resolved. Requested Action: None.	

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53	6.b	260	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. 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.	See Response to Comment #52. The Project will further 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.	Resolved. Requested Action: None.	
54	6.b	260	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. 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.	Comment is noted. 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. 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.	Resolved. Requested Action: None.	
55	6.b	262	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. Requested Action: Consider comment; provide additional detail on proposed action.	Comment is noted. See Response to Comment #54.	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.	Resolved. Requested Action: None.	

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56	6.b	263	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). 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.	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. 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." This was added to the EAW: "The project is seeking a beneficial reuse for the peat at an offsite location."	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.	Resolved. Requested Action: None.	
57	6.b	263	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. 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.	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.	Resolved. Requested Action: None.	
58	6.b	265	Upland offsite soil/peat disposal sites should be identified. Requested Action: Consider comment; edit document as needed.	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.	Follow-up. Suitable offsite disposal sites must be identified to satisfy wetland permits. Requested Action: Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Resolved. Requested Action: None.	

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64	6.b	266	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. Requested Action: Consider comment; edit document as needed. Add figures as suggested.	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.	Resolved. Requested Action: None.	
65	6.b	266	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. Requested Action: Edit document as needed to address comment. Further discussion of issue required to for treatment in Draft Scoping Decision Document.	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. 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. 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.	Resolved for the purpose of scoping. Requested Action: None.	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.	Resolved. Requested Action: None.	

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66	6.b	267	Is a separate emergency egress being considered? Requested Action: Answer question.	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. 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. 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. 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. In this manner there would be two separate and independent routes of egress from all production levels of the mine.	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.	Resolved. Requested Action: None.	

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67	6.b	275	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? Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.	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). 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. Additional details regarding liner design and monitoring would be evaluated as part of the EIS.	Resolved. Requested Action: None.	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. 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.	Resolved. Requested Action: None.	
68	6.b	275	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)? Requested Action: Answer question; modify text if warranted.	Any monitoring requirements for the construction, operations, and closure will be an outcome of the Environmental Review and Permitting process.	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.	Resolved. Requested Action: None.	
69	6.b	276	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.	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.	Resolved. Requested Action: None.	

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			Requested Action: Advisory only; future discussion item in development of Draft Scoping Decision Document.					
70	6.b	277	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. Requested Action: Advisory only; future discussion item in development of 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.	Resolved. Requested Action: None.	

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71	6.b	279	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? Requested Action: Answer question.	The curve radius of the tunnel has been determined to be 1000 feet based on: -The typical steering capabilities of a TBM in this diameter range; -The typical segmental lining design and performance in this diameter range; -Documented successful installation this geometry on previous TBM projects -The minimum amount of tunneling to reach the target area at the maximum gradient allowed by the mine trucks. 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. 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.	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.	Resolved. Requested Action: None.	

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72	6	281	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 air blast contours for overpressure levels? Requested Action: Answer questions.	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.	Resolved. Requested Action: None.	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.	Resolved. Requested Action:	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	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.	Comment no longer applicable. Requested Action: None.	
82	6.b	292	Where is excavation material placed from "box-cut" construction and what is done with groundwater pumped during construction (prior to liner installation). Requested Action: Answer question.	Refer to lines 498 – 502 for details on overburden material handling from the box cuts. Lines 295 – 297 provides detail on the excavation support system that will be designed to minimize groundwater inflow into the box cuts during construction. Minor seepage of water is still expected to leak though the excavation support system, and this water will be treated according to regulatory requirements. Further design of the excavation support system is underway and will be included for evaluation in the EIS.	Resolved. Requested Action: None.	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	Resolved. Requested Action: None.	

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						requirements. Further design of the excavation support system is underway, details will be included in the EIS data submittal.		
83	6.b	298	More information on the watertight liner is needed. Will the entire liner be left in place? It will need to be understood how the liner may change hydraulic conductivity in the overburden, saturated unconsolidated sediments and bedrock. Requested Action: Answer question.	Since the liner is an impermeable feature, it is not expected to have an impact on the site hydrology or hydrogeology at a project scale. The Project will address this issue, as necessary, in the EIS.	Resolved. Requested Action: None.	Please see the response to comment number 74.	Resolved. Requested Action: None.	
85	6.b	312	Where is the TBM assembled? How is it shipped to the site? What types of maintenance are required? Requested Action: Answer questions; edit text as needed.	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. Once all the partially assembled elements are received at site, the TBM is re-assembled in its entirety, commissioned, and launched. TBM preventive maintenance is regularly scheduled and performed by the Contractor as per	Resolved. Requested Action: None.	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.	Comment no longer applicable. Requested Action: None.	

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				manufacturer recommendations on a daily, weekly, and monthly basis. This is essential to the efficient operation of the TBM as it ultimately minimizes downtime.				
87	6.b	336	What kind of monitoring and control measures will be emplaced to assess potential ground settlement as a result of tunneling with the TBM? Requested Action: Answer question.	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. 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.	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	

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89	6.b	337	Development rock is termed waste rock in MN Rules Chapter 6132 which applies to this project. Revise to refer to the various categories or types of rocks with terms that apply in Minnesota. Requested Action: Edit document.	The Project disagrees that development rock is synonymous with waste rock in an underground mining context. Class 1 and Class 2 development rock is going to be reused as part of the mining process. Proposer requests to have further discussion regarding this item.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	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	Resolved. Requested Action: None.	
90	6.b	338	It does not appear that the temporary overburden storage area will be lined. What is the rationale (as currently known) for not lining the storage area? This is a potential concern since wetland peat will be a portion of overburden removed, which may lead to risk of mercury/methyl mercury leaching after rain events. Requested Action: Answer question. Response will inform development of Draft Scoping Decision Document.	The EAW is correct. The Project does not intend to line the unconsolidated glacial till "overburden". Depending on the geotechnical analysis of the glacial till removed, the Project intends to use this material as construction fill. The pile of unused material will be managed by to comply with Minnesota Rules, chapter 6132. The Project does not plan to have a peat stockpile and is actively looking for a beneficial reuse of the peat. The Project is also willing to continue the discussion with the state regarding possible reuses.	Suggest stating in EAW why it was determined that a liner is not needed. Requested Action: Add text to address comment.	Thank you for the comment; however, the updated project design no longer includes an overburden storage area, making this inquiry no longer applicable.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
91	6.b	338	Activities defined as temporary will need more discussion and review as they may related to determination of start of construction as well as any electrical generating units as they may need permit authorization prior to being brought onsite. Requested Action: Advisory only. Permitting consideration.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
92	6.b	340	what is the liner design for the backfill materials storage area? Requested Action: Answer question.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping. Requested Action: None.	Thank you for your question; however, the updated project design no longer includes a backfill materials storage area, making this inquiry no longer applicable.	Resolved. Requested Action: None.	

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93	6.b	340	Describe how the development rock would be staged in the backfill materials storage area including length of time before being used as backfill material, as well as associated geochemical characterization. Requested Action: Consider comment; edit text as needed.	The Backfill Materials Stockpile containing the development rock would have numerous controls and mitigations in place – the stockpile would be lined, would only be in existence for a short period of time, and all runoff and leachate would be sent to the Contact Water Treatment Plant. Additional description of the development rock stockpile can be referenced at lines 543-556 of the initial Project Description submission. Geochemical characterization of the development rock is a key component of the ongoing Materials Characterization Program which will be further developed for the EIS data submission. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	
94	6.b	343	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. Requested Action: Consider comment; edit text as needed.	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.	Resolved for the purpose of scoping. Requested Action: None.	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.	Resolved. Requested Action: None.	

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97	6.b	347	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..). Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.	Comment is noted. The Project will address, as necessary, this issue in the EIS. See Response to Comment #96.	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.	Resolved. Requested Action: None.	
98	6.b	347	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? Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.	Comment is noted. The Project will address, as necessary, this issue in the EIS. See Response to Comment #96.	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.	Resolved. Requested Action: None.	
99	6.b	347	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. Requested Action: Advisory only. Future discussion in development of Draft Scoping Decision Document.	Comment is noted. The Project will address, as necessary, this issue in the EIS. See Response to Comment #96.	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.	Resolved. Requested Action: None.	

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103	6.b	347	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? Requested Action: Consider comment; edit text with additional detail for clarity.	Comment is noted. The Project will address, as necessary, this issue in the EIS. See Response to Comment #96.	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. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	(from comment 39) 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)	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
106	6.b	355		EAW text updated to provide examples of TBMs used in other mining projects as well as additional information added to why this technique is proposed instead of conventual tunneling techniques.	Resolved. Requested Action: None.	Thank you for your question. The amended project design has eliminated using a TBM, making this specific inquiry no longer applicable.	Resolved. Requested Action: None.	
123	6.b	365		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.	Resolved. Requested Action: None.	
124	6.b	365		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.	Resolved. Requested Action: None.	

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125	6.b	366		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]"	Resolved. Requested Action: None.	
126	6.b	370		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.	Resolved. Requested Action: None.	
127	6.b	376		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.	Resolved. Requested Action: None.	
128	6.b	378		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.	Resolved. Requested Action: None.	
133	6.b	408		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.	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.	Resolved. Requested Action: None.	

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				Future discussion item, as necessary, in development of DSDD.				
134	6.b	412		The pumping rates from the underground mine will be variable and expected to increase as the mine development increases. However, the pumping rates are expected to be consistent with the mine inflows. The preliminary estimate for peak life-of-mine inflow is 800 – 1,600 gpm (see EAW, starting line # 1344), this is based on preliminary assessment and would be updated with additional data and modeling for the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
140	6.b	444		Comment is noted. Future discussion item, as necessary, in development of DSDD.	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. Requested Action: Answer question from original comment. Edit text to include estimated emissions from cement.	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.	Resolved. Requested Action: None.	

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148	6.b	445		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.	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.	Resolved. Requested Action: None.	
149	6.b	445		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.	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.	Resolved. Requested Action: None.	

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150	6.b	445		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.	Resolved. Requested Action: None.	
151	6.b	450		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. 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.	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? Requested Action: Answer question; modify text as warranted.	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.	Resolved. Requested Action: None.	
152	6.b	452		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.	Resolved. Requested Action: None.	
154	6.b	466		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.	Resolved. Requested Action: None.	
155	6.b	466		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.	Resolved. Requested Action: None.	

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156	6	466		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.	Resolved. Requested Action: None.	
157	6	466		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.	Resolved. Requested Action: None.	
158	6	466		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.	Resolved. Requested Action: None.	
159	6	466		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.	Resolved. Requested Action: None.	
160	6	466		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.	Resolved. Requested Action: None.	
161	6.b	468		Refer to lines 468–470. The Project will address this question, as necessary, in the EIS data submission.	Resolved for the purpose of scoping. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
162	6.b	468		Details regarding the methodologies and assumptions made for the crown pillar stability assessment will be provided in the EIS submission.	Resolved for the purpose of scoping. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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163	6.b	469		Details regarding the methodologies and assumptions made for the crown pillar stability assessment will be provided in the EIS submission.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
165	6.b	471		Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
166	6.b	473		Refer to lines 468–470. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
171	6.b	478		Underground booster fans and auxiliary fans would help move the air through the mine. An assortment of underground ventilation controls which may include ducting, air doors, regulators, and ventilation stoppings (walls) would also direct the appropriate amount of airflow to the appropriate areas of the underground mine.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
174	6.b	498		The Materials Characterization Program is underway and designed to collect a range of data needed to understand the geochemical constituents of overburden materials. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.	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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
175	6.b	498		Overburden (unconsolidated sediments and topsoil) would not be categorized (screened) before they are placed in their respective stockpiles. Overburden and topsoil would be screened before they are removed from the stockpiles to	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Please see the response to comment number 76.	Resolved. Requested Action: None.	

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				determine if they are suitable for one of the uses described in line 498 – 502.				
176	6.b	498		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.	Resolved. Requested Action: None.	
177	6.b	498		The Overburden Stockpile (temporary) is currently planned to be 40 feet in height.	Resolved. Requested Action: None.	Please see the response to comment number 76.	Resolved. Requested Action: None.	
178	6.b	501		Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.	Please see the response to comment number 76.	Resolved. Requested Action: None.	
179	6.b	501		Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping. Requested Action: None.	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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
180	6.b	501		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.	Resolved. Requested Action: None.	
181	6.b	503		Nearly the entire extent of this area of the facility is constructed on uplands without the presence of peat. All this area would have appropriate preparations for construction, including an appropriate degree of soil compaction to prevent differential settlement.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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182	6.b	503		Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	
183	6.b	503		The Materials Characterization Program is underway and designed to collect a range of data needed to understand the rock constituents that control acid rock generation and metal leaching. Sulfur is anticipated to be a primary parameter used to classify development rock; additional parameters would be included if they are determined to be proxies for geochemical behavior.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
184	6.b	504		Comment is noted. 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.	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.	Resolved. Requested Action: None.	

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				Future discussion item, as necessary, in development of DSDD.				
185	6.b	504		Comment is noted. 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. 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.	Resolved. Requested Action: None.	
186	6.b	504		Comment is noted. 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.	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.	Resolved. Requested Action: None.	

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187	6.b	507		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.	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.	Resolved. Requested Action: None.	
188	6.b	507		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.	Resolved. Requested Action: None.	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. 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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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						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. The following language is in the EAW: 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] [R2_Cmt_#144] The geochemical data from this program would be used to support materials management."		

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189	6.b	512		See Response to Comment #188.	Resolved. Requested Action: None.	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. 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. 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.	Resolved. Requested Action: None.	

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						The following language is in the EAW: 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] [R2_Cmt_#144] The geochemical data from this program would be used to support materials management."		
191	6.b	514		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.	Resolved. Requested Action: None.	

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192	6.b	515	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. Requested Action: Answer question.	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). 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	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 Requested Action: Modify text to address comment.	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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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				not anticipated to exceed criteria for Class 2.				
193	6.b	518		See Response to Comment #132.	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.	Resolved. Requested Action: None.	

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194	6.b	520		Comment is noted. See Response to Comment #192.	Resolved for the purpose of scoping. Requested Action: None.	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. 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. 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.	Resolved. Requested Action: None.	

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						The following language is in the EAW: 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] [R2_Cmt_#144] The geochemical data from this program would be used to support materials management."		
195	6.b	522		Comment is noted. See Response to Comment #192.	Follow up – The Proposer is encouraged to provide discussion in the DSDD Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	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.	Resolved. Requested Action: None.	
196	6.b	523		The Backfill Materials Stockpile would have an under-drain with a leak detection system beneath the liner. The specific intervals and timing of water sampling and testing at various locations would be determined in conjunction with the RGU during the permitting process after the EIS is complete.	Resolved. Requested Action: None.	Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.	Resolved. Requested Action: None.	

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197	6.b	524		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.	Resolved. Requested Action: None.	
200	6.b	530		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.	Resolved. Requested Action: None.	
203	6.b	536		Specific analysis methods and procedures for how the fines will be analyzed for sulfur content and reactivity will be defined during the permitting process once criteria are further developed.	Not resolved. The issue of how fines will be analyzed should not wait until the permitting process. Please note there currently are placeholders in the waste characterization workplan to discuss this topic in more detail. Requested Action: Consider comment; modify text as warranted.	Talon has reviewed this comment in light of the amended design, and the fines are to transported to the concentrator. The EAW draft has been updated as follows: 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]"	Resolved. Requested Action: None.	
204	6.b	537		Comment noted. See Response to Comment #201.	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.	Resolved. Requested Action: None.	
205	6.b	538		Comment is noted. The Materials Characterization Program includes the 'fines' material. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.	Please see the response to comment number 203.	Resolved. Requested Action: None.	
206	6.b	541		Comment noted. See Response to Comment #191.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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207	6.b	541		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.	Resolved. Requested Action: None.	
208	6.b	541		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.	Resolved. Requested Action: None.	
209	6.b	543		Specific details regarding the construction of the liner system at the Backfill Materials Stockpile will be provided as part of the EIS.	Resolved for the purpose of scoping. Requested Action: None.	Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.	Resolved. Requested Action: None.	
210	6.b	544		The engineering design for construction of the liner system at the Backfill Materials Stockpile has not yet been completed and will be provided as part of the EIS data submittal.	Resolved for the purpose of scoping. Requested Action: None.	Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.	Resolved. Requested Action: None.	

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211	6.b	545		Comment is noted. A Fugitive Dust Control Plan will be developed to control fugitive emissions. Future discussion item, as necessary, in development of the DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.	Comment no longer applicable. Requested Action: None.	
212	6.b	547		Comment noted. See Response to Comment #211.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
213	6.b	550		Comment noted. See Response to Comment #211.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Thank you for your question. The amended project design has eliminated the lined backfill storage area, making this specific inquiry no longer applicable.	Resolved. Requested Action: None.	
214	6.b	561		Specifics regarding the dust control system within the Cemented Backfill Plant will be discussed as part of the EIS. All underground mines receive inspections by Mine Safety and Health Administration (MSHA) officials on a minimum quarterly interval (at least four inspections per year). A component of these inspections will include sampling of employees' exposure to respirable crystalline silica, to ensure individual exposure over the length of the shift is below the MSHA health standard. In addition, the Project's Health & Safety	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.	Resolved. Requested Action: None.	

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				Department would conduct significant sampling between the regular MSHA inspections.				
215	6.b	563		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.	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.	Resolved. Requested Action: None.	
216	6.b	566		The Project intends to develop this as part of the EIS process when the various types of external & lower-volume material flows will be established in more detail.	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.	Resolved. Requested Action: None.	
219	6.b	569		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.	Resolved. Requested Action: None.	

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220	6.b	569		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.	Resolved. Requested Action: None.	
224	6.b	570	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? Requested Action: Answer questions.	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.	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. Requested Action: Modify text to address comment.	Talon has reviewed this comment in light of the amended design and the following sentences in the draft EAW have been updated as follows: "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]" "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]"	Follow-up: Is there any additional storage capacity in the Ore Transfer building, and is there any further contingency planning should the volume of ore exceed the listed buffer storage capacity? Requested Action: Answer question; modify text as warranted.	Thank you for your question. Design of the Ore Transfer Facility is ongoing, but the current design for the ore and waste rock buffer areas envision predetermined spaces on the building's concrete slab floor. In the rare event that both the building's storage capacity and the railcars are fully utilized—such as during a rail delay—Talon would manage material flows using a combination of standard operational strategies including temporarily staging mined material in open stopes.
225	6.b	571		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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
226	6.b	577		The railcars are expected to be conventional rigid gondolas or side-dump pivoting gondolas. The Project would not utilize bottom-dump railcars. All railcars would have a rigid cover or lid securely attached prior to leaving the Enclosed Rail Loadout Building, which would not be removed until entering the Enclosed Ore Receiving Building at the processing facility. This would	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.	Resolved. Requested Action: None.	

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				provide enclosure of the material in the gondola and enable control of fugitive dust and contact with precipitation.				
227	6.b	577		Comment is noted. The Project emission inventory will include all fugitive emissions. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
228	6.b	578	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. Requested Action: Advisory only. Future discussion topic in development of Draft Scoping Decision Document.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Follow up – The Proposer is encouraged to provide discussion in the DSDD. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
229	6.b	585		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.	Resolved. Requested Action: None.	

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230	6.b	586	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. 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.	Materials handling procedures for the event of an extended suspension of production is a subject that will be evaluated as part of the EIS process.	Follow Up - The environmental significance associated with metal leaching materials left on surface during potential periods of temporary closure is high because these materials could generate metal leaching/acid rock drainage that the project as designed is not capable of managing. This could lead to significant environmental risks/impacts. A firm and practical method of ensuring that no ore/class 3 rock is left on surface or otherwise unremedied is required in order to frame this topic appropriately for the DSDD. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
231	6.b	587		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.	Resolved. Requested Action: None.	
232	6.b	589		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.	Resolved. Requested Action: None.	
233	6.b	596		Comment is noted. Future discussion item, as necessary, in development of DSDD.	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.	Resolved. Requested Action: None.	
234	6.b	596		Comment is noted. Future discussion item, as necessary, in development of DSDD.	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.	Resolved. Requested Action: None.	

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236	6.b	606		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.	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.	Resolved. Requested Action: None.	
237	6.b	615		Ultimately this will be a decision for the RGU. 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.	Resolved. Requested Action: None.	The amended EAW maintains the intent of the original response, but now in context to the amended design.	Resolved. Requested Action: None.	

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238	6.b	621		The “Categories of Water” subheading in the project description has been modified to reflect the below. Graphic 12 has also been updated. 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. -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. -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.	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.	Resolved. Requested Action: None.	
239	6.b	628		Figure 3 shows the location of the Industrial Stormwater Pond in the northern portion of the site east of the Contact Water Storage Tanks. Both locations are now labelled in Figure 3.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
240	6.b	629		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.	Resolved. Requested Action: None.	

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244	6.b	630		Commented noted. See Response to Comment #235	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.	Resolved. Requested Action: None.	
247	6.b	630	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. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. See Response to Comment #109.	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. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
248	6.b	633	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. 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.	Follow Up - Acknowledged. Please note the regulatory framework used as the basis for proposed discharge standards in future documentation to inform the DSDD Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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249	6.b	651	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? Requested Action: Address comment and update EAW as appropriate.	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. Further details regarding design and operation of the surface contact water handling system will be addressed as part of the EIS process.	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	
250	6.b	651	Provide more information regarding how the lined ditches and sumps will be constructed, including hydraulic conductivity estimates for all liner materials. Requested Action: Address comment and update EAW as appropriate.	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. Further details regarding design and operation of the surface contact water handling system will be addressed as part of the EIS process.	Resolved. Requested Action: None.	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	Resolved. Requested Action: None.	

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251	6.b	653	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. 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.	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.	Resolved. Requested Action: None.	
252	6.b	653	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. 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.	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.	Resolved. Requested Action: None.	

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253	6.b	654	What is the definition of an "extreme storm"? Requested Action: Answer question.	EAW text was edited to provide a description of an extreme event. “In the event of an extreme storm event (high intensity, short duration),…”	This is not specific enough. Please provide a detailed description of what intensity and what duration storm event Requested Action: Modify text to address comment.	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."	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
254	6.b	654	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? Requested Action: Address comment and update EAW as appropriate.	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.	Follow Up - Acknowledged. Please describe this mitigation in the EAW in order to inform the DSDD. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	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.	Resolved. Requested Action: None.	
255	6.b	658	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. Requested Action: Advisory only. Future discussion issue for 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.	Resolved. Requested Action: None.	

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256	6.b	660	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. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Follow Up - The 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. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
257	6.b	662	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." 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 determined that the original response is still appropriate.	Resolved. 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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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264	6.b	677	What is the minerology 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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
267	6.b	683	What would necessitate diverting water to storage tanks rather than the water treatment plant? Requested Action: Answer question.	The Contact Water Storage Tanks would be for handling high intensity or long duration storm events where the volume of water in the short term exceeds the design treatment rate of the Contact Water Treatment Plant.	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	

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271	6.b	691	More information is requested for details regarding the project-specific industrial stormwater pollution prevention plan (SWPPP) and details for best management practices (BMP) that will be in place to prevent contaminants from entering the watershed. Requested Action: Future discussion item.	Comment is noted.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
272	6.b	697	How will stormwater be evaluated to ensure it is meeting the appropriate standards? What specific standards will be used? Requested Action: Answer question.	The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.	Follow-up: How will stormwater be evaluated to ensure it is meeting the appropriate standards? Requested Action: Answer question; modify text as warranted.	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." NEED TO ADD TO THE EAW	Resolved. Requested Action: None.	
273	6.b	699	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. Requested Action: Note comment. Regulatory guidance.	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	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.	Resolved. Requested Action: None.	

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				the site (Figure 16) is near or less than this requirement.				
274	6.b	706	How will construction stormwater BMPs be evaluated to ensure proper construction and maintenance over the life of the project? Requested Action: Answer question.	Monitoring and maintenance requirements for stormwater BMPs will be an outcome of the Environmental Review and Permitting process.	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.	Resolved. Requested Action: None.	
275	6.b	707	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. 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.	Resolved. Requested Action: None.	
276	6.b	707	Will all construction stormwater BMPs be removed at the end of the project? Requested Action: Answer question.	By the end of the project the construction stormwater BMPs would have been removed.	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
279	6.b	715	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
282	6.b	718	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.	Resolved. Requested Action: None.	
283	6.b	718	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? Requested Action: Address	Comment is noted. The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.	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.	Resolved. Requested Action: None.	

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			comment and update EAW as appropriate.	The Project will address, as necessary, this issue in the EIS.				
285	6.b	728	Identify plans to work with MDH Drinking Water Protection Section confirming the category of public water supply for this facility and moving forward with compliance with the Safe Drinking Water Act as appropriate for the category of public water supply. This facility will presumably qualify as a noncommunity public water system (PWS). Responsibilities as a PWS should be understood. https://www.health.state.mn.us/communities/environment/water/docs/ncom/noncom.pdf Requested Action: Regulatory guidance. Future discussion item.	Comment is noted.	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. Requested Action: Consider comment; modify text as warranted.	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.	Unresolved - Add plan review and approval requirements outlined in Minnesota Rules 4720.0010 to the table. Requested Action: Modify EAW to address comment.	Thank you for the comment. Table 9.1 has been updated.
286	6.b	728	What type of water treatment? Would there be any water treatment residual waste streams? Requested Action: Address comment and update EAW as appropriate.	The Project is evaluating various water treatment technologies and is also investigating beneficial reuse opportunities for the water treatment residuals that might be produced. 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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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288	6.b	728	How will mining activities impact the capture area of the well and chemistry of the well water? How will the chemistry of the well water be monitored and what specific standards will be used? Requested Action: Address comment and update EAW as appropriate.	The potable water well will adhere to State of Minnesota Department of Health guidelines and guidance and the federal Safe Drinking Water Act.	Follow-up: How will mining activities impact the capture area of the well and chemistry of the well water? Requested Action: Answer question; modify text as warranted.	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.	Resolved. Requested Action: None.	
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	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.	Resolved. Requested Action: None.	

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			standards will be used? Requested Action: Answer question.					
290	6.b	728	Construction of an additional potable water supply well should be reviewed by Well Management Section and Drinking Water Protection Section staff from the Minnesota Department of Health. Proper siting of new wells will be required to ensure all potential contaminant setback distances are met and are maintained for the life of the well and/or project. Identify the proposed water-supply well location including reference to separation distance to potential contamination sources and utilities such as electric, propane, other; e.g. mine site map with wastewater systems, buildings, petroleum storage and piping, buried stormwater ponds and piping, propane storage and piping etc.. Requested Action: Regulatory guidance. Future discussion item.	Comment is noted.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
292	6.b	737	How will potential impacts of treated sanitary water to the local watershed be assessed and remediated if there are impacts? Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address this question, as necessary, in the EIS and/or permitting.	Resolved. Requested Action: None.	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.	Comment no longer applicable. Requested Action: None.	
293	6.b	739	Provide the rationale for combining treated waters for discharge rather than discharging separately. There needs to be more information provided on the receiving water bodies, what volumes and quality of water they can accept, any existing impacts to	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Follow up – The Proposer is encouraged to provide more information at a conceptual level to allow the reviewer to evaluate potential impacts from treated discharge on the receiving environment. Requested Action: Consider	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.	Resolved. Requested Action: None.	

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			the waters, etc. Requested Action: Address comment and update EAW as appropriate.		comment; modify text as warranted.			
298	6.b	743	Will an EA or Supplemental EIS be required for the new substation and power distribution system? Requested Action: Address comment and update EAW as appropriate.	No, the substation and power distribution are part of the Project being proposed.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
306	6.b	755	More detailed information on the emergency power is necessary. Will an EA or Supplemental EIS be required? Requested Action: Answer question.	No.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
307	6.b	757	Fuel tanks will need to be identified and characterized for air quality related impacts. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved for the purpose of scoping. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
308	6.b	766	How will the integrity of pipelines be ensured? Requested Action: Answer question.	Leak detection and leak mitigation for contact water pipelines will be addressed as part of the EIS. The majority of the length of the contact water pipelines lies within the contact area, any potential leaks from the pipelines within this area would report back to the Contact Water Collection Sumps.	Resolved. Requested Action: None.	Please see the response to comment number 1001.	Resolved. Requested Action: None.	
309	6.b	766	Will any secondary containment structures be placed around the contact water pipelines to contain potential leaks? Requested Action: Answer question.	Comment is noted. See Response to Comment #308.	Not Resolved - Leak mitigation will be addressed in the EIS. Need to address whether secondary containment will be used around pipelines that are not in the contact area. 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.	Resolved. Requested Action: None.	
310	6.b	771	Support Facilities may include items defined as 'insignificant activities' and will need to be characterized in air quality related impacts.	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.	Resolved. Requested Action: None.	

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			Requested Action: Regulatory guidance. Future discussion item.					
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.	Resolved. Requested Action: None.	
312	6.b	785	Emissions generated from employee parking lots may also be included in the air quality emission calculations. Requested Action: Regulatory guidance.	MPCA guidance dated July 15, 2021 titled “Interim Paved Road Modeling Practice” states “It is anticipated that lots used exclusively for employee parking may be omitted from the calculations. Emissions from portions of a parking lot used for process-related deliveries will generally need to be calculated.”	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
316	6.b	794	Add a note stating that regrading would be to match existing grades and natural drainage paths (to maintain conditions/drainage to downstream waterbodies). Specify the type of vegetation that would be used to revegetate the site taking climate change impacts into consideration. Matching the existing (native) vegetation may not make sense 10 to 20 years from now. As line 113 states, “Project water balance and estimated discharge quantities” will be provided at a later date. Requested Action: Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Follow-up. This information will be provided at a later date (in development of DSDD). Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved. Requested Action: None.	
317	6.b	798	Clarify how the stockpiles (overburden, development rock) on site will be dealt with in closure. What steps would need to be taken if the mine closed early following an extended period of care and maintenance, including considerations for management of stockpiles, particularly any Class 3 development rock and/or ore left in the rail loadout storage area,	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.	Thank you for your question. The amended project design no longer includes the surface storage of overburden or waste rock.	Resolved. Requested Action: None.	

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			and water management? Requested Action: Address comment and update EAW as appropriate.					
318	6.b	800	Any wells constructed on site will require proper sealing once they are no longer in use. Requested Action: Regulatory guidance.	The Project will comply with Minnesota Rules Chapters 4725 and 4727 and Minnesota Statutes Chapter 103I regarding well abandonment.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
319	6.b	800	The locations and design, including permeability estimates, for any engineering controls to limit water movement should be described. In particular, engineering controls to isolate bedrock groundwater from water in the surficial aquifer should be provided and described. These engineering controls should also be included in post-mining modeling scenarios. Requested Action: Regulatory guidance. Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
320	6.b	801	If known, would method of underground mine closure require perpetual maintenance? Requested Action: Answer question.	The Project's intention is to establish a closure plan which will not require maintenance in perpetuity. This topic will be developed in further detail as part of the EIS pending additional analysis.	Suggest stating in EAW that intention is to establish closure plan that will not require perpetual maintenance. Requested Action: Modify text to address comment.	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]"	Commenter unable to participate in Round 3. Requested Action: None at this time.	

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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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
325	6.c	819	Visual impact analysis for a 78 foot structure is needed Requested Action: Future discussion item in development of the Draft Scoping Decision Document.	Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
327	6.d	823	Include calculations that would support a statement that speaks to the total carbon footprint of the mining operation. How does this carbon footprint compare to the projected savings in carbon emissions from the materials mined from the site? Requested Action: Future discussion item.	A life-cycle-analysis (LCA) will be undertaken to determine carbon impacts once mining and processing plans have been further developed in detail for the EIS.	Follow-up. This information will be provided at a later date (in development of DSDD). Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved. Requested Action: None.	
328	6.d	823	EAW Item 6d only requires explanation of project purpose. The objective statement provides information somewhat more appropriate to project need, which is not required for private actions; it is also unsupported in present form. Requested Action: Advisory only. Future RGU decision item.	Comment is noted.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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329	6.d	834	What is the community engagement plan? How has the project already interacted with local communities and what are plans for engagement moving forward? How has or will the project incorporate community input? This information should be included in EIS and more details of what the community engagement plan will consist of should be included in scoping Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	The Project has held numerous informal public meetings on a quarterly cadence to gather community input and feedback, which has been utilized in the design of the facilities and development of the Project Description. The Project looks forward to ongoing informal community input combined with the formal public scoping and comment process.	Follow-up: Would like to emphasize that it would be useful to understand at least in a general sense, if not specifically, what the community input/feedback has been surrounding the project as well as whether the project has made or will make any adjustments based on that input/feedback. Also, more details on community meetings such as topics discussed, who attendees were (general description), concerns raised, etc. would be helpful in demonstrating meaningful community engagement. Requested Action: Consider comment; modify text as warranted.	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.	Resolved. Requested Action: None.	
330	6.d	838	What are estimates for types of and numbers of jobs needed? What are salary ranges of those jobs? An analysis of the economic impacts to MN/surrounding communities should be included in EIS. More detail on what that analysis will include should be provided in scoping. Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted. The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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338	6.e	890	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. Requested Action: Advisory only. 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. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
341	6.e	890	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? Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted. See Response to Comment #338.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Please see the response to comment number 339.	Resolved. Requested Action: None.	
342	6.e	894	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. Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted. See Response to Comment #338.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Please see the response to comment number 340.	Resolved. Requested Action: None.	
343	7.a	901	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) –	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.	Resolved. Requested Action: None.	

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			2036 – 2040 Consider more than just extreme precipitation. Evaluate the impact(s) of drought conditions, wind, extreme heat, etc. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document					
346	7.a	906	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. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Comment 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 343.	Resolved. Requested Action: None.	
347	7.a	910	P values should be included with all regressions to show significance, as well as confidence intervals and prediction intervals for all regressions. Requested Action: Consider comment; edit figure and/or text as warranted.	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.	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. Requested Action: If known, add text indicating type of analysis will be used in EIS.	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	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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						provided in the EIS to ensure transparency and accuracy in the interpretation of climate data.		
348	7.a	919	Explain why the drought period of 1910-1940 was excluded from the data set and why 1990-2022 is specifically called out. Requested Action: Consider comment; edit figure and/or text as warranted.	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.	Not Resolved. The overall annual historical precipitation trends should be used Requested Action: Modify to address comment.	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: 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	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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						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]" 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]"		

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349	7.a	919	Historical annual precipitation data and trendlines for Mississippi River - Grand Rapids watershed do no match output from the Minnesota Climate Explorer Tool. Ensure correct data and trends are presented. Requested Action: Consider comment; edit figure and/or text as warranted.	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.	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. Requested Action: Modify to address comment.	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: 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)" 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]"	Resolved. Requested Action: None.	
350	7.a	930	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. Requested Action: Review and edit as appropriate.	The reference was removed.	Not resolved. The incorrect reference was removed, but no alternative source for the data was provided. Requested Action: Add text to address comment.	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. 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." 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	Follow-up: Cities where precipitation was evaluated were listed, but the details about how Graphic 7.3 was developed are still unclear. Note also that a number of these cities are not in northeastern Minnesota. Where was precipitation data for these stations obtained (e.g., are these NWS stations, other?)? Were Atlas 14 100-yr 24-hr precip values for each specific location used to evaluate historic precipitation at each specific location, and combined annually to produce the plot? Requested Action: Answer	"Northeast" has been removed from the caption and descriptive paragraph. However, the observed trend in increasing storm event intensity is still acknowledged. Further details on the analysis, as necessary, will be provided in the EIS data submission.

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						for 38 precipitation monitoring stations across northeastern Minnesota, including Ada, Canby, Cass Lake, Cloquet, Collegeville, 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]"	question; modify text as warranted; expect the EIS to provide more detail on how the graphic was developed.	
351	7.a	938	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. 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.	Resolved. Requested Action: None.	
352	7.a	943	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. 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.	Resolved. Requested Action: None.	
353	7.a	957	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.	Graphic 17 has been redone to clarify that the one model is the mean of the other 8 models. Replace existing graphs and add footnote defining Model Mean as the mean of the other 8 models	Resolved. Requested Action: None	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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			Requested Action: Address Comment and edit as appropriate					
354	7.a	965	Graphic 18 shows comparisons for nine models, while the UMN climate projections provide output for only eight models. Clarify whether "Model 1" represents the "Model Mean" or one of the eight models. Requested Action: Address Comment and edit as appropriate	Graphic 18 has been redone to clarify that the one model is the mean of the other 8 models. Replace existing graphs and add footnote defining Model Mean as the mean of the other 8 models	Resolved. Requested Action: None	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
355	7.a	969	The exposure assessment should consider all available information when evaluating impacts related to climate change. In addition to the EPA Climate Resilience Evaluation and Awareness Tool, the assessment should consider locally downscaled climate data from UMN, using NOAA Atlas 14 values for the 100-year, 24-hour storm that are on the 90th percentile and storm transposition as an example of an extreme precipitation event. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
356	7.a	969	Text states "The EPA Streamflow Projections Map anticipates an increase in streamflow by a ratio of 1.2 to 1.4 in 2071-2100 (RCP 8.5)…". Clarify what the reported ratio represents (e.g., projected change in annual average or annual high daily streamflow). Requested Action: Address Comment and edit as appropriate	The EPA Streamflow Projections Map anticipates an increase in annual daily average streamflow by a ratio of > 1.2 to 1.4 in 2071 to 2100 (RCP 8.5) compared to baseline historical flow (1976 to 2005) (reference (13)). Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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357	7.a	971	This type of information can be further supplemented by running additional scenarios (based on additional sources of information) to evaluate the range of streamflows that may occur in this area as a result of climate change. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	The EPA Streamflow Projections Map anticipates an increase in annual daily average streamflow by a ratio of > 1.2 to 1.4 in 2071 to 2100 (RCP 8.5) compared to baseline historical flow (1976 to 2005) (reference (13)). Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
358	7.a	972	Changes in climate have already occurred (e.g. increase in frequency/intensity of storm/flood events), so it is not accurate to say climate change will have minimal impact on the project location during the 10 year project period. Requested Action: Address Comment and edit as appropriate	Comment is noted. See Response to Comment #344.	Suggest adding "during proposed project period" to Talon's edit on line 1182 since the site after closure will have exposure to long-term changes in climate Requested Action: Edit text as requested.	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. 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." 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]"	Commenter unable to participate in Round 3. Requested Action: None at this time.	
359	7.a	972	What if the project extends past 10 years? How will mine impacts be minimized after closure of the mine? Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. As stated in the EAW data submittal "The Project would have an approximately 7- to 10-year production life."	Resolved. Requested Action: None	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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360	7.a	973	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. 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.	Resolved. Requested Action: None.	
361	7.a	974	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? Requested Action: Answer Question. 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.	Resolved. Requested Action: None.	
363	7.b	979	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. Requested Action: Consider comment; edit text as warranted.	Comment is noted. See Response to Comment #344.	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). Requested Action: Revise text as requested.	Thank you for your comment. Additional climate considerations and adaptations have been added to the table.	Resolved. Requested Action: None.	

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364	7.b	979	This statement does not account for impacts that may occur at the project site after closure. Requested Action: Consider comment; edit text as warranted.	Comment is noted. See Response to Comment #344.	Suggest adding "during proposed project period" to Talon's edit on line 1182 since the site after closure will have exposure to long-term changes in climate Requested Action: Edit text as requested.	Please see the response to comment number 358.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
365	7.b	979	More discussion is needed regarding future storm intensities and the design storm size that will 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. 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	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. 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	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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						effective approach to stormwater management.		
366	7.b	979	Details of how the recent historic increase in intense rainfalls are incorporated into project design should be provided in the EAW, including assumptions of rainfall depth, distribution and frequency, and how the design accounts for these rainfalls. Requested Action: Consider comment; edit text as warranted.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None	Please see the response to comment number 365.	Resolved. Requested Action: None.	

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367	7.b	983	Increases in precipitation intensity in the Great Lakes region due to climate change are statistically significant. The region has experienced several 500 and 1000 year events over the past 10-15 years. Does the design of the mine at a minimum accommodate a 500 year precipitation event? Also, does the design account for the probable maximum flood for the area? Requested Action: Address comment and edit as appropriate. These are factors likely to be considered in project-related impact assessment modeling. Future discussion item in the development of the Draft Scoping Decision Document.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. Future discussion item, as necessary, in development of DSDD. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None	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. 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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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368	7.b	983	Explain how water resources will be unaffected if wetlands will be lost and flooding could occur. Requested Action: Consider comment; edit text as warranted.	Stormwater will be managed onsite either in the Industrial Stormwater Pond or in the Contact Water Storage Tanks which will minimize impacts on water resources. The Project will evaluate this issue, as necessary, in the EIS	RGU notes that FSD will require complete assessment of project-related cover type change and water management and potential for impacts. Requested Action: Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
369	7.b	984	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 stablished. Requested Action: Consider comment; edit text as warranted.	Comment is noted. The Project will address this issue, as necessary, in the EIS.	Resolved for the purpose of scoping. Requested Action: None	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
370	7.b	984	Consider additional adaptation strategies like planting native vegetation that also improve biodiversity and wildlife habitat. Requested Action: Consider comment; edit text as warranted.	Additional buffer strips and vegetation would be planted where feasible. Native species would be used to improve biodiversity and wildlife habitat where feasible.	Resolved. Requested Action: None	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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371	7.b	985	This conclusion cannot be made based on the lack of relevant information presented in the EAW. Please provide the rationale and supporting data (i.e. animated effluent water quality, studies assessing potential impacts of discharge on fish/wildlife/plant ecosystems in receiving water bodies, etc..) to substantiate this claim. Requested Action: Consider comment; edit text as warranted.	Comment is noted.	Follow Up – Proposer is encouraged to modify the text of the EAW as per the comment. Requested Action: Edit text as requested.	Comment is noted. The Project will address this issue, as necessary, in the EIS.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
372	7.b	985	Evaluating impacts related to climate change and adaptation is a requirement of the EAW and needs to be conducted regardless of the size of the project. By completing an exposure assessment of the facilities as well as the processes, the Proposer and the State of Minnesota can more accurately evaluate the need to incorporate adaptation strategies to protect the facilities as well as the surrounding environment and communities. This assessment should consider data beyond annual averages in precipitation and temperature as the facilities and processes will likely be more vulnerable to seasonal and/or monthly variations as well as daily variation (e.g., higher nighttime lows). The proposer should consider all climate-related impacts including more frequent extreme precipitation events, drought conditions, temperature (i.e., warmer winters and nights, increased summer heat). Requested Action: Consider comment; edit text as warranted.	Comment is noted. The Project will address this issue, as necessary, in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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375	8	990	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? Requested Action:	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. Modified Table 5 in EAW to say "Wetlands, shallow lakes (<2 meters deep) and ditches "for row 1.	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.	Resolved. Requested Action: None.	
376	8	991	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. Requested Action: Consider comment; edit text as warranted.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.	Resolved 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.	Resolved. Requested Action: None.	
377	8	994	Describe changes in carbon sequestration due to changes in cover type. (983, Table 4) Requested Action: Address comment; modify text as warranted.	Comment is noted. Please see Table 4, Project Design row, Project Information column.	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.	Resolved. Requested Action: None.	
378	8	994	The table indicates that brush/grassland will increase as a result of the project. Is this due to the loss or conversion of wetlands? Requested Action: Answer question. Edit text as necessary	There are 4 cover types being converted to impervious surfaces as shown in Table 5. These include wetlands/shallow lakes/ditches, wooded/forest, brus/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	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.	Resolved. Requested Action: None.	

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				Closure section in the Project Description of the EAW.				
380	8	994	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? Requested Action: Answer Questions; Future discussion item for development of the Draft Scoping Decision Document	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.	Follow-up: This issue will continue to be of issue as the project progresses. Requested Action: Advisory only.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
381	8	996	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. Requested Action: Consider comment; edit figure and/or text as warranted.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope. 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	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.	Resolved. Requested Action: None.	

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				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.				
382	8	999	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. 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.	Resolved. Requested Action: None.	

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384	9	1008	Include the Office of the State Archaeologist (OSA) License. This will be require for archaeologists working on non-federal state and public Lands. Requested Action: Advisory	Comment is noted.	Not resolved. Requested Action: Add text as original comment requested.	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. The "Summary Of Required Permits/Approvals" table was edited with: EAW December 2024 MN Department of Administration State Archaeologist Office of the State Archaeologist (OSA) License	Resolved. Requested Action: None.	
385	9	1008	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? Requested Action: Answer question.	The Project has identified potential permits that the project could require for in Table 8. If the RGU identifies other applicable permits, please advise.	Resolved for the purpose of scoping. DNR will assess need for any additional permits/approvals over the course of 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.	Resolved. Requested Action: None.	
386	9	1008	If known, what federal, state, or local permits and approvals are needed for the North Dakota project components? Requested Action: Answer question.	Talon will be scoping the permitting process for North Dakota in conjunction with the North Dakota Department of Environmental Quality (DEQ) and applicable federal agencies. The North Dakota project is also undergoing a federal NEPA environmental review process in line with requirements associated	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.	Resolved. Requested Action: None.	

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				with the Department of Energy grant for development of the facility.				
390	10.a.i	1019	The land use description is limited to a very small area near the Project area. Given that the description of water discharges in two HUC-12 watersheds that the Project lies within, it would be appropriate to also list WMAs and State Parks that lie downstream of project area. Requested Action: Consider comment; edit text as warranted.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. 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.	Resolved. Requested Action: None.	
392	10.a.i	1021	Typo: mission punctuation after 'infrastructure' Requested Action: Edit EAW	Comment is noted. EAW has been updated.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
393	10.a.i	1021	Sentence is stated twice. Remove duplicate. Requested Action: Edit EAW	Comment is noted. EAW has been updated.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
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	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.	Resolved. Requested Action: None.	

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			developing the Draft Scoping Decision Document					
395	10.a.ii	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.	Resolved. Requested Action: None.	
396	10.a.iii	1051	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.	Resolved. Requested Action: None.	
397	10.a.iii	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. Requested Action: Consider comment; edit text as warranted.	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. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
398	10.a.iv	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.	Resolved. Requested Action: None.	

Comment ID	EAW Item	EAW v1 Line No.	Round 1 RGU Comment and Requested Action 09/19/2023	Talon Response and Treatment in EAW 10/11/2023	Round 2 RGU Response and Requested Action 02/04/2024	Talon Response and Treatment in EAW 12/12/2024	Round 3 RGU Response and Requested Action 04/10/2025	Talon Response and Treatment in EAW 06/23/2025
400	10.b	1067	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. 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. The Project will keep monitoring FEMA floodplain mapping for updates as the project progresses through the environmental review process.	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). Requested Action: Modify text to address comment.	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: 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." 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]"	Resolved. Requested Action: None.	
401	10.b	1070	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.	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.	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.	Resolved. Requested Action: None.	

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			Requested Action: Consider comment; edit text as warranted.					
402	6.b	1084	The RGU offers the following notes: 1. The document should provide a high-level summary of what is known on the geochemical characterization of the overburden or any rock types. Furthermore, mineralogy and geological information should be used to develop the geochemical rock types for the project based on expert geochemists and geologists site knowledge. 2. Once the geochemical rock types are understood, the project geochemists should assess the potential for acid rock drainage and metal leaching. NPR criteria for the project should be developed and proposed for review to support treatment of the issue in the EIS. 3. If known, the document should discuss the expected quantities of each rock type and a high level schedule of year over year extraction of different rock types. More precise estimates would likely be required for the EIS. 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.	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.	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. Requested Action: Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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403	11.a	1084	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. Requested Action: Consider comment; edit text as warranted.	Detailed descriptions of the surficial and bedrock geology will be provided 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.	Resolved. Requested Action: None.	
404	11.a	1100	There needs to be a discussion of structure and hydrogeology somewhere in this section Requested Action: Consider comment; edit text as warranted.	Structural geology and further detailed hydrogeology (groundwater) of the Project will be provided 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.	Resolved. Requested Action: None.	

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405	All EAW	1100	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. 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. 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. New Comment for Line 172-177: General comment. The Project Description and other relevant items should provide supply consumption estimates as appropriate. Requested Action: Address comment; modify text if warranted.	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. 2) The planned use of conceptual and mathematical models to support the EIS is discussed on lines 1307-1311. 3) Comment is noted. Revised EAW text to include "Additional subsidence analysis and supporting data will be incorporated into the EIS data submission." 4) 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.	Resolved. Requested Action: None.	

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406	11.a	1101	Note, some of the geology terminology is unclear or incorrect. For example, it is stated the Thomson Formation (incorrectly spelled as Thompson) consists of "metamorphosed sediments". Note, sediments are not a rock type. Classically the Thomson Formation is described as consisting of intercalated slate, siltstone, and graywacke. Also, "hornfels grade" is not technically accurate. Hornfels is a metamorphic facies not a metamorphic grade. The hornfels facies metamorphic grade increases from Albite-Epidote => Hornblende => Pyroxene. Lastly, the major metamorphic event history for the Thomson Formation is regional metamorphism during the Penokean Orogeny followed by thermal metamorphism during the Mid-Continent Rift event. Requested Action: Consider comment; edit text as warranted.	Comment is noted. Text updated. 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."	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.	Resolved. Requested Action: None.	

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407	6.b	1112	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. Requested Action: Consider comment and edit text as needed. Future discussion item in development of the Draft Scoping Decision Document.	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.	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.	Resolved. Requested Action: None.	
408	6.b	1112	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. 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 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.	Resolved. Requested Action: None.	

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409	6.b	1112	RGU notes that mafic and ultramafic rock types often contain elongate minerals, including asbestiform amphiboles and chrysotile. Background data needs for the EIS would likely include sampling and analysis results for elongate minerals. In terms of regulatory requirements if elongate minerals are present, OSHA and MSHA require worker protection and mitigations to prevent inhalation & ingestion, transport of dusts on soiled clothing, and aerial transport of dust off-Site (beyond project fence line). 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 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.	Resolved. Requested Action: None.	
410	6.b	1112	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. 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 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.	Resolved. Requested Action: None.	
411	11.a	1112	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. Requested Action: Consider comment; edit text as warranted. Future discussion topic in development of Draft Scoping Decision Document	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	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.	Resolved. Requested Action: None.	

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				with the Department of Energy grant for development of the facility				
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
417	11.b	1140	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
421	11.b	1150	The description of impacts to hydric soils, particularly due to the railroad spur construction, is insufficient. Requested Action: Consider comment; edit text as warranted.	Comment is noted. The Project will address this question, as necessary, in the EIS.	Resolved at this stage. Topic will be addressed during EIS as necessary. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
422	11.b	1150	Underground mining techniques are stated to minimize impacts to soils. However, no explanation is provided as to how or to what extent impacts would be minimized. The use of the word "minimize" rather than "avoid" also suggests that there would still be impacts. Peat accumulating wetlands are extremely sensitive to hydrologic changes and topographic changes (i.e. subsidence). Detailed explanation of how impacts would be avoided or minimized is justified. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Additional text has been added to “Orebody Access” in Section 6 on strategies to minimize impact to soils and overburden by proposing a TBM for the Decline development. Also see Response to Comment #87 and Line 466 – 470 regarding ground settlement and crown pillar deflection.	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	
423	11.b	1159	These numbers do not indicate if potential remediation of peat soils would require additional excavation. This potential should be considered in excavation estimates. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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426	12.a.i	1180	Provide additional detail and clarification with regard to general surface water from the project area in particular as it pertains to the Tamarack River and Mud Lake watersheds. Requested Action: Answer question and update EAW as appropriate.	Text updated in the EAW.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
428	12.a.i	1183	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. Requested Action: Answer question and update EAW as appropriate.	The "public water basins" referenced in the text, tables, and figures indicate mapped basins of the Public Waters Inventory and do not include potential public waters that meet the definition of Minnesota Statute 103G.005 but are unmapped. Link to statute: https://www.revisor.mn.gov/statutes/cite/103G.005	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.	Resolved. Requested Action: None.	
429	12.a.i	1187	Only public waters with wild rice are listed. Have field surveys been competed to determine additional wild rice habitat downstream of project area (and therefore receiving project discharge)? 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 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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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432	12.a.i	1196	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. https://files.dnr.state.mn.us/fish_wildlife/wildlife/wildrice/statewide-inventory-wild-rice-waters.pdf	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: https://public.tableau.com/app/profile/mpca.data.services/viz/wild_rice_v4/Information and 2024 Minnesota Impaired Water List [R2_Cmt_#432]	Resolved. Requested Action: None.	
433	12.a.i	1196	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.	Resolved. Requested Action: None.	
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. https://www.dnr.state.mn.us/waters/watermgmt_section/pwi/maps.html.	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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436	6.b	1255	Back in Item 6b, Line 519, the TBM is expected to cross from the overburden to bedrock containing elevated sulfur. The potential release of elevated sulfur from the bedrock to surrounding waters (including those supporting wild rice) is a concern. It is also a concern if any aspect of the project results in releases of sulfur dioxide (SO2) that could also adversely affect wild rice resources. The EIS would likely require the conceptual model to be capable of addressing this potential flow path and assess potential water quality impacts to surface waters. Requested Action: Advisory only. Future discussion item for the Draft Scoping Decision Document on treatment of issue for EIS.	Comment is noted. All water produced by the TBM will be collected and treated prior to discharge. Specifically, sulfur dioxide (SO2) is not anticipated to be released as part of the TBM tunneling process as it is a combustion gas. The TBM relies on mechanical means of breaking break rock (not blasting), thus the means of generating sulfur dioxide during this process is not anticipated. 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.	Resolved. Requested Action: None.	
437	12.a.i	1255	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. 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.	Resolved. Requested Action: None.	
438	12.a.i	1255	How would potential negative impacts to surface water quality or quantity 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.	Resolved. Requested Action: None.	
439	12.a.i	1255	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	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.	Please see the response to comment number 365.	Resolved. Requested Action: None.	

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			assess impacts to surface water and natural resources. Requested Action: Future discussion item.					
440	12.a.i	1255	How often is monitoring occurring and at what locations? What parameters are being monitored? Requested Action: Answer question.	Comment is noted. 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.	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. Requested Action: Modify text to address comment.	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: "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	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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						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] "		
441	12.a.i	1255	Will monitoring of surface water flow and quality be of the same, or similar, frequency during mine operation? Requested Action: Answer question.	Comment is noted. Required monitoring during operations will be determined as part of the Environmental Review and/or Permitting stages of the project.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
442	12.a.i	1255	Provide the locations of all surface water monitoring sites and flow measurements collected at the sites as well as manual flow measurements, logger data and rating curves for the purpose of reviewing flow measurements. Additional stream flow monitoring locations may be recommended if it is determined that more measurements are needed to adequately characterize baseline surface water flows. Requested Action: Address comment and update EAW as appropriate.	See Response to Comment #440.	Not resolved. More detailed information on existing surface water monitoring is necessary to determine if monitoring is sufficient to provide the information necessary for analyses needed in the EIS. Requested Action: Modify text to address comment.	Please see the response to comment number 440.	Resolved. Requested Action: None.	

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443	12.a.i	1255	It is recommended that the conceptual surface water flow model be discussed with the DNR prior to constructing the quantitative models that will be used to estimate the effects of the project on water resources. Changes may need to be made to the conceptual model depending on the outcome of the discussion(s). Requested Action: Regulatory guidance. Consult DNR Lands and Minerals regarding potential groundwater models.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Not resolved. Surface water modeling will be discussed during development of the Draft Scoping Decision Document. Requested Action: Advisory.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
444	12.a.i	1255	Provide figures showing surface water baseline conditions. It would be helpful to display variations in streamflow over time using time series plots (hydrographs), as well as graphs displaying surface water quality in ditches, streams, and lakes. Requested Action: Future discussion item.	Comment is noted. Surface water baseline conditions, including streamflow variations at multiple station, hydrographs and water quality will be provided, as necessary, as part of the EIS data submission.	Not resolved. More detailed information on existing surface waters is necessary to determine scope of analysis needed in the EIS. Requested Action: Add text to address comment.	The following text was added to the EAW: EAW December 2024 "Monitoring data would be provided, as necessary, as part of the EIS submission. [R2_Cmt_#444]"	Follow-up: Same comment from Round 2 still applies. Although it is understood that not all monitoring data will be provided for the EAW, this data should be used to provide a summary of surface water baseline conditions. Requested Action: Modify EAW to address comment.	Thank you for the comment. The data provided to-date is considered adequate to support developing the Draft Scoping Decision document. As noted in the December 2024 EAW update, surface water monitoring data, including streamflow and water quality, will be provided as part of the EIS data submission.
445	6.b	1255	Does Talon propose to include a quantitative water model to simulate contact water management, industrial stormwater management, and construction stormwater? If yes, the SEAW should identify the type of simulation software and what conditions would be modeled. Requested Action: Answer question.	Comment is noted. Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
446	6.b	1255	For quantitative surface water hydrology modeling, what software program would be used to simulate runoff (if necessary)? The modeling should specify exactly where and how precipitation falling on the project features may be released back into natural systems, including during the reclamation and closure phases.	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.	Resolved. Requested Action: None.	

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			Requested Action: Answer question.					
447	6.b	1255	Does Talon propose to tailor the water model to address different potential operating conditions (full operation; partial shutdown; temporary idle; or similar)? Requested Action: Answer question.	Comment is noted. Modeling objectives, scenarios, and applicable software will be determined as part of the EIS process.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
448	6.b	1255	Does Talon propose to specify the potential pathways for how industrial stormwater, contact water, or leakage from other project features that could be released to surface waters and quantified? Requested Action: Answer question.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
449	6.b	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.	Resolved. Requested Action: None.	
450	6.b	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.	Resolved at this stage. RGU notes the Draft Scoping Decision may require use of various data sources, including LiDAR data as available, to develop the topographic profile of the project area. Resolved. Requested Action:	
451	6.b	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	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.	Resolved. Requested Action: None.	

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			be evaluated? Requested Action: Answer question.					
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.	Follow Up - An expanded version of Figure 12 (Flowchart of Water Types and Handling) that incorporates mine features (i.e. water storage ponds) and discharge locations (rather than just 'release to environment') is required to provide the clarity necessary to develop the DSDD. 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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	
454	12.a.i	1261	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. Requested Action: Address comment and update EAW as appropriate.	A Level 3 Wetland delineation was submitted to the agencies in 2023. 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."	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.	Resolved. Requested Action: None.	

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				The EAW was updated to reflect this.				
456	12.a.i	1261	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. Requested Action: Address comment and update EAW as appropriate.	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.	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.	Resolved. Requested Action: None.	
457	12.a.i	1263	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. Requested Action: Answer question regarding wetland boundaries in Figure 14.	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.	Resolved. Requested Action:	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
458	12.a.i	1264	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. Requested Action: Advisory.	Comment is noted. The Project will participate in future discussions on this subject as part of the DSDD process.	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.	Resolved. Requested Action: None.	

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			Regulatory guidance. Future discussion item.					
459	12.a.i	1266	Wetland categories found in project area are listed, but water quality and discharge volume impacts cannot be assessed without knowing more about water sources for different wetlands. Basic water quality data such as pH and conductivity would be useful for initial review of subsequent wetland impacts subsection in item 12. Requested Action: Future discussion item.	Comment is noted. Data collected in the wetlands and the associated analyses will be provided in the EIS data submittal.	Resolved at this stage. To be addressed in the EIS Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
460	12.a.i	1266	The color chosen to represent the "National Wetlands Inventory" (NWI) is very faint. Choose a color that is more visible. Requested Action: Address comment and update Figure 14 as appropriate.	Figure 14 has been updated to improve color contrast for the NWI.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
461	12.a.i	1269	Ditching in wetlands is a past impact that is now reflected in the current hydrologic behavior of the ditched wetland system. This will need to be accounted for in the assessment of project-specific impacts to these previously-impacted systems. Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted.	Resolved at this stage. To be addressed in the EIS Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
462	6.b	1272	RGU notes it will be necessary to describe potential groundwater flow impacts resulting from peat excavation. Requested Action: Consider comment; provide additional detail on what is currently known. The issue will have to be addressed in	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.	Resolved. Requested Action: None.	

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			the Draft Scoping Decision Document.					
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.	Resolved. Requested Action: None.	
464	12.a.i	1272	Provide more complete description of wetland water level and water quality monitoring efforts. Insufficient information to determine whether current efforts will adequately inform EIS. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
465	12.a.i	1272	Further detail of wetland water level and water quality monitoring methods is warranted. No details are provided other than that data is being collected. Some knowledge of methods is needed to assess potential scoping needs. Further, floristic quality monitoring should be considered given the potential of large peatland complexes and adjacent wetlands to harbor high quality plant communities and rare species. Hydrogeomorphic classification and corresponding functions should also be considered to further assess potential impacts. 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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
468	12.a.i	1272	Provide a summary of the wetlands water quality data collected to date, along with a map identifying the locations of the monitoring stations. It is unclear from the EIS into which wetland(s) the mine plans to discharge effluent into. Providing baseline water quality/water flow and seasonal variation of each will assist in appropriate discharge planning and identify any potential effects to surface water as a result of wastewater discharges. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. For the EAW data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping. The project will address, as necessary, this issue in the EIS. This Comment also refers to the EIS. The Project has not submitted an EIS data submittal, but an EAW data submittal for scoping the EIS. Refer to Figure 5 and Lines 7–5 - 718 in the EAW for details regarding proposed discharge location.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
469	12.a.i	1272	Provide the locations of all wetland monitoring wells and baseline wetland monitoring data. Additional wetland monitoring wells may be recommended if it is determined that more wells are needed to adequately characterize wetland hydrology. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. For the EAW data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping. The project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
470	12.a.i	1272	It is recommended that the conceptual wetland hydrology model be discussed with the DNR prior to constructing the quantitative models that will be use to estimate the effects of the project on water resources. Changes may need to be made to the conceptual model depending on the outcome of the discussion(s). Requested Action: Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Not resolved. Wetlands hydrology models will be discussed in development of the Draft Scoping Decision Document. Requested Action: Advisory. To be discussed in development of SEAW/DSDD.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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471	12.a.i	1272	It is recommended that the quantitative wetland hydrology models that will be used to estimate the effects of the project on wetlands be discussed with the DNR prior to the start of modeling. Requested Action: Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Not resolved. Wetlands hydrology models will be discussed in development of the Draft Scoping Decision Document. Requested Action: Advisory. To be discussed in development of SEAW/DSDD.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
472	12.a.i	1272	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. Are the monitoring wells referred to in this paragraph shown on Figure 15? Requested Action: Future discussion item. Answer question concerning monitoring well locations.	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.	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.	Resolved. Requested Action: None.	
476	12.a.ii	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
478	12.a.ii	1290	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. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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479	12.a.ii	1290	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.	Resolved. Requested Action: None.	
480	12.a.ii	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.	Resolved. Requested Action: None.	

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481	12.a.ii	1305	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.	Resolved. Requested Action: None.	

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482	12.a.ii	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.	Resolved. Requested Action: None.	
483	12.a.ii	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.	Are there plans to place monitoring wells outside the project area in the Area of Potential Effect when it is defined? If not, the monitoring wells in the Project Area may not detect extent of impacts outside Project Area. 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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
484	12.a.ii	1305	Are existing monitoring wells completed in the same aquifer(s) as nearby water wells? Requested Action: Answer question.	Comment is noted. For this data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping.	Follow-up: Nearby well information may be publicly available via the Minnesota Well Index. 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.	Resolved. Requested Action: None.	

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485	12.a.ii	1305	Identify plans for sealing any existing water-supply/monitoring wells and exploratory borings located within the footprint of the mine project by a licensed well contractor. MDH Well Management Section can be contacted for questions. Requested Action: Regulatory guidance. Provide discussion of well and boring abandonment procedures in EAW as appropriate.	All applicable wells and borings will be sealed in accordance with Minnesota Rules Chapters 4725 and 4727 and Minnesota Statutes Chapter 103I.	The response from Talon should be added to the EAW so that readers know which standard Talon plans to adhere to when sealing wells/borings 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.	Resolved. Requested Action: None.	
486	12.a.ii	1305	Well construction logs, stratigraphy reports, monitoring details and monitoring data for all monitoring wells installed in and around the project site should be provided. Additional monitoring wells may be recommended if it is determined that the current monitoring well network does not adequately characterize the hydrologic conditions at the mine site. Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
487	12.a.ii	1305	To better understand existing conditions, the following figures would be helpful: horizontal and vertical hydraulic gradients in the surficial and bedrock aquifers using cross sections and/or potentiometric surface maps; groundwater level variations over time displayed using time series plots (hydrographs); graphs displaying groundwater quality in both bedrock and surficial aquifers. Requested Action: Provide requested figures.	Comment is noted. For this data submittal and for this specific topic the Project is only making use of publicly available data, which the Project believes is sufficient for scoping. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
488	12.a.ii	1305	When available, provide information from all pumping tests, slug tests, or any other tests performed to evaluate aquifer properties. Additional testing may be recommended if it is determined more information is needed to adequately characterize	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.	Resolved. Requested Action: None.	

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			the hydrologic conditions at the mine site. Requested Action: Future discussion item.					
489	12.a.ii	1305	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.	Resolved. Requested Action: None.	
490	12.a.ii	1305	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.	Resolved. Requested Action: None.	
491	6.b	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	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.	Resolved. Requested Action: None.	

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			reclamation and closure. Requested Action: Answer question.					
492	6.b	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.	Resolved. Requested Action: None.	
493	6.b	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.	Resolved. Requested Action: None.	
494	6.b	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.	Resolved. Requested Action: None.	
495	6.b	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.	Resolved. Requested Action: None.	
496	6.b	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.	Resolved. Requested Action: None.	

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497	6.b	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.	Resolved. Requested Action: None.	
498	6.b	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.	Resolved. Requested Action: None.	
499	12.a.ii	1307	The DNR requests the opportunity to review and discuss the conceptual groundwater model prior to constructing the quantitative groundwater models that will be used to estimate the effects of the project on water resources. Changes may need to be made to the conceptual model depending on the outcome of the discussion(s). The DNR also requests the opportunity to discuss the quantitative groundwater models that will be used to estimate the effects of the project on water resources. This will help ensure that the DNR agrees they will adequately predict all impacts to water resources from the project. Requested Action: Regulatory guidance. Consult DNR Lands and Minerals regarding potential groundwater models.	Comment noted.	Resolved at this stage. To be addressed in the EIS Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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500	12.a.ii	1308	As stated, quantitative modeling will include groundwater and particle tracking (Line 2064). As additional information relating to aquifer and bedrock hydraulic properties will gradually become available as the mining drifts and stopes advance, A plan should be in place to: (i) perform bounding analysis for the EIS and (ii) update the model during the mine operation to confirm the bounding analysis and to guide mining operations, if necessary. If the infiltrating water includes potential contaminants, the modeling plan should include the development of a transport model to assess the mixing between the infiltrating water and ambient groundwater. Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
501	12.a.ii	1309	What type of quantitative groundwater flow models will be constructed and will they be sufficient enough to model changes in groundwater flow direction and/or contaminant transport, as well as potential impacts to nearby surface waters & wetlands, as a result of mining activities? Will all models, modeling software and data, and inputs to the model be available for MDH staff so it can be verified and replicated? Requested Action: Answer question and update EAW as appropriate.	As part of the EIS data submittal the applicable models, modeling software and data, and inputs to the water resources models will be made available.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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503	12.a.ii	1312	Site specific monitoring well data should be used to characterize the depth to water in the project area rather than general NRCS soils information. Requested Action: Update EAW with depth to groundwater information from monitoring well network.	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.	Not resolved. Publicly available information does not provide the necessary information to evaluate depth to water in all relevant geologic units. Information on the relationships between depth to water in the Quaternary water table aquifers, Quaternary buried artesian aquifers, and bedrock aquifers is necessary to evaluate the scope of analysis needed in the EIS. Requested Action: Modify text to address comment.	The following sentence was added to the EAW: EAW December 2024 "The depth to water map will be updated with site-specific data for the EIS data submittal. [R2_Cmt_#503]"	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
511	12.b.i	1335	EAW item 12.b.i.3 requests information on effects to surface or groundwater from wastewater discharges; however, the response provided defers any discussion of potential effects to the EIS. Provide information to address the item, such as effects of increased flow above baseline levels, contact/stormwater discharge, and including mitigation to the impacts. Requested Action: Update the EAW with the requested information.	The Project believes the project description provided in section 12.b.i.3 of the EAW is sufficient to scope the EIS. The project description will be updated during EIS development to satisfy the EIS scope. Effects, impacts and mitigations will form part of the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
512	12.b.i	1344	The EAW included an estimation of mine inflow as one number – peak life of mine inflow. Would it be more useful to know the inflow in stages? What is this number based on? Is the inflow expected to be spatially variant (getting back to enhanced permeability)? Requested Action: Answer questions and update EAW as appropriate.	The inflow estimate is based on the frequency of conductive zones identified by preliminary groundwater characterization completed prior to 2020, multiplied by the mine development linear meters using screening level analytical equations including some conservatism to develop a range for scoping. The Project has since collected additional data that would be used to develop, with consultation on input parameters, conceptual	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.	Resolved. Requested Action: None.	

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				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.				
513	12.b.i	1344	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. Requested Action: Provide additional information on the inflow rate data.	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. 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.	Not Resolved. Include description of inflow estimate method provided here in the EAW document. Requested Action: Add text to address comment.	The EAW was updated as follows: 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	Resolved. Requested Action: None.	

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						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]" "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		

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						tests, from ongoing studies, mitigation methods and a rigorous modeling method that is commensurate with the significant amount of additional data collected since 2020. [R2_Cmt_#513]"		
514	12.b.i	1344	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). Requested Action: Future discussion item.	Comment is noted. See Response to Comment #513.	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.	Resolved. Requested Action: None.	

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515	12.b.i	1344	A reference is needed for "a peak life-of-mine inflow of 800-1,600 gpm". Requested Action: Provide reference material requested.	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.	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.	Resolved. Requested Action: None.	
516	12.b.i	1352	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. Requested Action: Address comment and update EAW as appropriate.	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.	Resolved. Requested Action: None.	Please see the response to comment number 365.	Resolved. Requested Action: None.	
517	12.b.i	1352	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. Requested Action: Address comment and update EAW as appropriate.	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.	Resolved. Requested Action: None.	Please see the response to comment number 516.	Resolved. Requested Action: None.	

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518	12.b.i	1356	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. Requested Action: Future discussion item.	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.	Not Resolved- to be addressed in EIS Requested Action: None.	Please see the response to comment number 516.	Resolved. Requested Action: None.	
519	12.b.i	1357	Converting rainfall to an average flow of 40gpm spread out over a whole year is not necessarily a helpful conversion due to the sporadic and seasonal nature of precipitation. Depending on how the system is designed and the amount of equalization capacity, discharge is likely to be significantly higher during spring/runoff and discharge may be negligible for winter months. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. See Response to Comment #516.	Resolved. Requested Action: None.	Please see the response to comment number 516.	Resolved. Requested Action: None.	

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520	12.b.i	1358	DNR notes that stormwater generation with the project is likely to receive detailed analysis in the EIS. Whether the proposed estimated maximum average of 40 gpm that would be routed for treatment constitutes a "conservative estimate" remains to be determined. Also, whether the "maximum average" is the most insightful measure remains to be seen, for example when accounting for extreme precipitation events in the impact assessment. Requested Action: Address comment and update EAW as appropriate. Future discussion item in development of Draft Scoping Decision Document.	Comment is noted. See Response to Comment #516.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	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. 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	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
521	12.b.i	1364	Information on treatment plant design and the data used will need to be provided. Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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522	12.b.i	1368	Detailed stream flow modeling should be performed using HEC-RAS or another stream flow modeling program to demonstrate that the north ditch network has the capacity to handle discharges from the water treatment plant and the sanitary treatment plant without causing adverse impacts to the downstream receiving waters and infrastructure. StreamStats is not a sufficiently accurate tool for this application. Results from StreamStats must always be field verified. Modeling should be supported by and calibrated to site specific monitoring data. Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
523	12.b.i	1368	Potential effects of increased flow on hydrology, wetlands, and shallow and deep groundwater flow systems should be included in the bounding analysis based on the quantitative groundwater flow model. (See comment for Line 1308.) Requested Action: Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
524	12.b.i	1371	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. Requested Action: Address comment and update EAW as appropriate.	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.	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.	Resolved. Requested Action: None.	

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525	12.b.i	1371	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. Requested Action: Address comments and update EAW as appropriate. Future discussion necessary regarding alternative methods.	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. 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. 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.	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.	Resolved. Requested Action: None.	
526	12.b.i	1373	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 Requested Action: Address comment and update EAW as appropriate.	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.	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.	Resolved. Requested Action: None.	

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527	6.b	1379	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? 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.	Resolved. Requested Action: None.	
528	6.b	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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	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	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.	Resolved. Requested Action: None.	

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			comment and update EAW as appropriate.	be provided as part of the EIS data submittal.				
533	12.b.i	1387	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 in needed regarding what size storm event will be used to evaluate impacts from discharges on receiving waters. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The methodology and sources for future climate change projections used in the various assessments will be detailed in the EIS data submittal.	Not Resolved- Lines 1614 to 1615 in the revised EAW state large precipitation events are expected to remain in the current range that the project would remain operational. However, lines 1180 to 1182 state long term climate change, with the exception of already observed increase in extreme rainfall events, will have minimal impact on the location. Lines 1611 - 1622 should be revised to indicate that an increase in the frequency of extreme events is expected. Requested Action: Modify text to address comment.	To address the comment the following sentence as added to the EAW: EAW December 2024 "The methodology and sources for future climate change projections used ion the various assessments would be detailed in the EIS data submittal. [R2_Cmt_#533]"	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
534	12.b.i	1390	DNR notes that water modeling will need to account for local climate trends around variability and trends as applied to this part of Minnesota. The project area is already wetter and warmer than past conditions, with precipitation extremes increasing all seasons (that is expected to continue). Requested Action: Advisory only. Future discussion item for development of Draft Scoping Decision Document.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
537	12.b.ii	1434	What information or data support the following statement in the EAW: "environmental effects from industrial stormwater discharges on receiving waters are anticipated to be minor"? Requested Action: Address	Comment is noted. See Response to Comment #536.	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.	Resolved. Requested Action: None.	

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			comment and update EAW as appropriate.					
538	12.b.ii	1436	Extreme rainfall events must be consider in the design of the stormwater treatment system. Requested Action: DNR will evaluate available information during the development of the Scoping EAW to determine the treatment in the EIS.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
539	12.b.ii	1439	State where the precipitation #'s are coming from (i.e. Atlas 14?) Also provide the rainfall amount. Requested Action: Address comment and update EAW as appropriate.	The Comment in question refers to Reference 9 of the EAW. Reference 9 of the EAW refers to NOAA, Atlas 14, which is a 24-hour, 200-year event at 6.98 inches for the Project Area.	Resolved. Requested Action: None.	Please see the response to comment number 516.	Resolved. Requested Action: None.	
540	12.b.ii	1441	More details are requested in the next data submittal, specifically a map indicating the proposed discharge locations. Requested Action: Provide additional information on discharge locations, including a figure as requested	Figure 5 shows the proposed discharge location and route via the public drainage system. This will be further evaluated during in the EIS.	Follow Up – The EAW indicates that stormwater would be discharged into nearby wetlands and/or ditches. Figure 5 shows a linear discharge route, which appears to be a ditch. It is unclear where discharge into a wetland would occur. Please update the EAW text and figure 5 to show where discharge flows into a wetland area. 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"	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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542	12.b.ii	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.	Not Resolved- to be addressed in EIS. Figure 5 does not show how water will be moved from the treatment plant and sediment pond to the existing ditch. Requested Action: Edit figure if possible	Please see the response to comment number 540.	Resolved. Requested Action: None.	
543	12.b.ii	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.	Resolved. Requested Action: None.	
544	12.b.ii	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.	Resolved. Requested Action: None.	
545	12.b.ii	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 www.heat.gov and www.heat.gov/pages/climate-explorer) 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.	Resolved. Requested Action: None.	
546	12.b.ii	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.	Resolved. Requested Action: None.	

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547	12.b.ii	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.	Not resolved. While text referring to evapotranspiration was deleted, additional supporting information and analysis are still necessary to state that the water balance and patterns of large precipitation events are expected to remain in the current range during the project lifetime. 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]"	Resolved at this stage. RGU notes the Draft Scoping Decision will likely require information and analysis to address issue of whether the water balance and patterns of large precipitation events would be expected to remain in the current range during the project lifetime regarding use of potable water with respect to climate trends. Requested Action: None.	
548	12.b.ii	1464	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	Comment is noted. The Project will meet water quality standards as described in Minnesota Rules, chapter 7050.0220 subpart 3a.	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.	Resolved. Requested Action: None.	

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			the proposer in this section are likely not the over-riding drivers for treatment. Requested Action: Future discussion item.					
552	12.b.iii	1484	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. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The details for water appropriation and impacts will be evaluated 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.	Resolved. Requested Action: None.	
553	12.b.iii	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.	Resolved. Requested Action: None.	
554	12.b.iii	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.	Resolved. Requested Action: None.	

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555	12.b.iii	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.	Not resolved. The scope of analysis needed for temporary dewatering impacts cannot be determined without an estimate of the water quantity expected to be withdrawn and discharged. 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]"	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
558	12.b.iii	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.	Resolved. Requested Action: None.	
559	12.b.iii	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.	Resolved. Requested Action: None.	
560	12.b.iii	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.	Resolved. Requested Action: None.	
561	12.b.iii	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.	Not resolved. Recommend removing reference to GP 1997-0005 and stating the preliminary estimate. Being under 50 million gallons is not relevant unless it is determined the GP can be used. 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]"	Resolved. Requested Action: None.	

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562	12.b.iii	1494	A reference is needed for the total amount of water to be withdrawn of "50 million gallons per day". Requested Action: Provide reference material requested.	This estimate is the upper limit for a temporary construction permit (line 1495). The construction dewatering amounts are expected to be less that 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.	Resolved. Requested Action: None.	
563	12.b.iii	1500	References are needed for the estimated amount of potable water to be withdrawn (3.6 (average) and 4.8 (maximum) million gallons per year). Requested Action: Provide reference material requested.	A more detailed estimate of potable water requirements would be provided in the EIS data submittal, which would be based on final facility design. These estimates were generated by considering the anticipated workforce, discussed on lines 2224-2226 of the EAW.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
564	12.b.iii	1505	What plans are in place should the potable water not actually be resilient to future climate trends? Requested Action: Address comment.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
565	12.b.iii	1507	The EAW states that "the Project would primarily rely on the recycling of treated contact water." Water quality and water treatment system will need to be evaluated to determine the suitability for reuse and/or discharge Requested Action: Regulatory guidance. Future discussion item.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
566	12.b.iii	1509	Any new non-potable well that will be used to supply water for the TBM and early stages of mine operations should be included in the EIS as well as the proposed appropriation amount so that potential impacts from the appropriation can be evaluated. Requested Action: Regulatory guidance. Future discussion item.	Non-potable water requirements for the TBM and early stages of the mine operations would be refined with further engineering and would be provided for the EIS data submittal.	Not Resolved- to be addressed in EIS 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.	Resolved. Requested Action: None.	

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567	12.b.iii	1511	How will this change in water level of the groundwater affect the surrounding hydrology of the area? Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
568	12.b.iii	1518	It may be incorrect to assume that the inflow water comes from deep TIC only. Information to support this assumption is not presented. It is likely that groundwater inflow would include water from above 400-foot depth as well as surficial deposits. Surficial water bodies and wetlands may be impacted. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. Indicates that conceptual and quantitative groundwater flow models will be developed. To be addressed in the EIS Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
570	12.b.iii	1523	Withdrawing ground water would most likely have an impact on surface water and wetland features especially if wetlands are primarily groundwater fed. The impact of changes in water level on water quality should also be considered including mercury, DOC, and sulfate & sulfide concentrations. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
571	12.b.iii	1523	The hydrogeochemical evaluation should include assessment of the risk of Acid Mine Drainage and other mechanisms of contaminant mobilization. Requested Action: Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
572	12.b.iii	1526	All groundwater appropriations are required to be sustainable under MN Statute 103G.287, Subd. 5. Groundwater appropriations could be affected if it is determined that they are harming ecosystems, degrading water, or reducing water levels beyond the reach of public water supply and private domestic wells.	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.	Resolved. Requested Action: None.	

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			Requested Action: Regulatory guidance. Future discussion item.					
577	12.b.iv	1529	There will be direct wetland impacts as a result of proposed discharges from the water treatment plants into wetlands north of the Project Area. This is not discussed in response to 12.b.4.a. Provide a discussion of potential environmental impacts to wetlands, measures to mitigate environmental impacts, and rationale supporting the efficacy of these mitigation measures in the next submission. Requested Action: Address comment and update EAW as appropriate.	Potential impacts and mitigations to wetlands related to the discharge from the water treatment plants would be evaluated, as necessary, in the EIS data submittal.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
578	12.b.iv	1532	Impacts to the watershed and consideration of climate change are not included in the impact assessment. These appear to be headwater wetlands and consideration of watershed impacts is warranted. Consideration of climate change impacts may also be warranted given the potential for peatland impacts, which are carbon sinks. Requested Action: Address comment and update EAW as appropriate.	The assessment of impacts to relevant watersheds would consider climate change and would be discussed in the EIS data submittal.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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579	12.b.iv	1539	Peat accumulating wetlands are extremely sensitive to hydrologic changes and topographic changes (i.e., subsidence). Detailed explanation of how impacts will be avoided or minimized is justified. Requested Action: Address comment and update EAW as appropriate.	The assessment of impacts and mitigations to wetlands will be discussed, as necessary, in the EIS and permitting processes.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
580	12.b.iv	1539	Wetland sequencing and thorough alternatives analysis should be provided for all unavoidable impacts. Requested Action: Future discussion item. The comment is appropriate for the alternatives process. Issue deferred to development of the Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
581	12.b.iv	1539	Insufficient discussion of reasonably foreseeable physical, biological, hydrological, and geochemical wetland impacts that will require significant further study in EIS. More than half of project area is comprised of hydric soils and wetlands. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be addressed in the EIS Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
582	12.b.iv	1542	Further describe methods to remediate peat solid. Requested Action: Address comment and update EAW as appropriate.	The Project requires further clarification of this Comment.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action:	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
583	12.b.iv	1542	It is not clear if impact estimates are based on NWI or delineated wetland acreages. The data source should be specified and consistently identified. It is not clear the types of wetlands that are proposed for impact. A table would be helpful. Requested Action: Address comment and update EAW as	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.	Resolved. Requested Action: None.	

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			appropriate, including requested table.					
584	12.b.iv	1542	Information regarding the flooded borrow pits including, but not limited to, what the borrow material will be used for, where they will be constructed, their size, and whether water will be appropriated from them should be provided. Requested Action: Address comment and update EAW as appropriate.	The referenced borrow pits discussed on Line 1544 of the EAW refer to existing features within the Project Area.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
585	12.b.iv	1543	More detail is needed about construction of the railway spur and the impact(s) to wetlands/surrounding area. Requested Action: Address comment and update EAW as appropriate.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved. Requested Action: None.	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]"	Resolved. Requested Action: None.	
586	12.b.iv	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.	Resolved. Requested Action: None.	

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587	12.b.iv	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.	Resolved. Requested Action: None.	
588	12.b.iv	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? Requested Action: Address comment and update EAW as appropriate.	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
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.	Follow-up: Brief explanation of why selected mitigation option(s) were chosen would be useful Requested Action: Add text to address comment.	Please see the response to comment number 576.	Resolved. Requested Action: None.	
593	12.b	1576	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.	Resolved. Requested Action: None.	
594	12.b.iv	1578	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. Requested Action: Provide the information requested and update the EAW as appropriate.	Potential downstream impacts from water treatment discharge would be addressed 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.	Resolved. Requested Action: None.	

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595	12.b.iv	1581	Define typical watercraft. Requested Action: Provide definition.	The EAW data submittal was edited by deleting: "Surface waters within and 1-mile downstream of the Project Area are not navigable by typical watercraft, so this use would not be affected." and adding: "The Project does not anticipate impacting the number or type of watercraft usage within or downstream of 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.	Resolved. Requested Action: None.	
596	13.a	1583	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. Requested Action: Advisory; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. The Project will participate in future discussions on this subject.	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.	Resolved. Requested Action: None.	
597	13.a	1593	In reference to Figure 16, what's the shallowest point for the stormwater pond location and is it possible for infiltration to be used? Requested Action: Answer question.	The Project requires clarification on the use of the term 'shallowest' in reference to the ground surface. See Response to Comment #381.	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.	Resolved. Requested Action: None.	
598	13.a	1618	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. Requested Action: Consider comment; edit figure and/or text as warranted.	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.	Resolved. Requested Action: None.	

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601	13.b	1630	With the overburden pile for mined material, where is the water flowing to? Is this going to the stormwater ponds or discharged into the nearby wetlands? Requested Action: Answer question.	Overburden is not a mined material. Please clarify which stockpile or activity is being referred to in this Comment.	Follow-up: Overburden is the rock or soil layer that needs to be removed to access the mined ore. The stockpile on site in graphic 1 of the EAW shows the location of what is being inquired about since this area doesn't have hydrology on the figure 4 map labeled. Where is this water flowing since the hydrology of the site looks like it may discharge into the surrounding wetlands? Requested Action: Answer question and update EAW as necessary.	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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
612	14.a	1762	Are mitigation measures being considered to protect nearby wild rice lakes? If so, what are they? If not, why not? Requested Action: Answer question. Discussion item for 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.	Resolved. Requested Action: None.	
613	14.a	1762	Include the specific number of wild rice lakes (4 total) Requested Action: Address comment; modify text as warranted.	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.	Use the most recent MPCA impaired waters list as project progresses. There are more up to date documents available. Requested Action: Update, if possible. If not, Advisory for the future.	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.	Resolved. Requested Action: None.	

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614	14.a	1766	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. Requested Action: Address comment; modify text as warranted.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope.	Resolved at this stage. To be discussed in development of the 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.	Resolved. Requested Action: None.	
615	14.a	1769	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. 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.	Resolved. Requested Action: None.	
617	14.b	1777	This is a very cursory review of State-listed T&E species. All species from the state list (link below) with the potential to exist on site should evaluated. https://files.dnr.state.mn.us/natural_resources/ets/endlist.pdf Requested Action: Consider comment; edit text as warranted.	Comment is noted. The Project would appreciate guidance from the State of Minnesota on how to address this concern. 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.	Resolved. Requested Action: None.	

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618	14.b	1810	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. Requested Action: Consider comment; edit text as warranted.	The Project has supplied project descriptions that are deemed sufficient for defining the scope of analyses for the EIS. It is anticipated that these descriptions will undergo revisions throughout the EIS development to adequately meet the requirements of the EIS scope. Please clarify the statement regarding "...to be submitted to MCE for review."	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. 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. A Natural Heritage Review is required as part of Minnesota's environmental review process. In addition, a Natural Heritage Review is strongly encouraged for all projects as due diligence for following state law and considering impacts to Minnesota's Natural Heritage. " Requested Action: Submit to MCE and include in next submittal.	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.	Unresolved. The December 2022 EAW form instructs the proposer to attach the Natural Heritage Review Letter from the DNR. Scope and extent of the review area will be determined based on project spatial data and project description provided by the proposer via the Minnesota Conservation Explorer. A Natural Heritage Review must be conducted for all projects that meet the threshold for formal environmental review. Requested Action: Provide data as requested.	The proposer agrees that a "Natural Heritage Review must be conducted for all projects that meet the threshold for formal environmental review." Since the project will be a mandatory EIS, the proposer will submit this data as part of its EIS data submission.
619	14.b	1810	The Minnesota Conservation Explorer should be queried to assess the potential for the project to impact state-listed rare species and natural communities. The results of this query should be reported in the data submittal and the correspondence provided to the RGU.	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	Resolved. Requested Action: None.	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	Resolved. Requested Action:	

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			Requested Action: Address comment and update EAW as appropriate.	EAW data submittal (lines 1810-1815).		the project's scope and areas of interest will have been defined		
620	14.b	1821	The EAW indicates that no wild rice is present with the project area due to lack of lake habitat. Wild rice may be found in any shallow open water under suitable conditions. Given the large area of wetland within the Project Area, it is feasible that suitable wild rice habitat may be present. Requested Action: Identify potential wild rice areas within the Project Area	Comment is noted. See Response to Comment #632.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
621	14.b	1821	It should be noted here (or elsewhere) that the state water quality standard for sulfate in wild rice waters is 10mg/L and that this project must comply with the standard in wild rice waters that have been identified in close proximity to the project. Requested Action: Address comment. Modify text if needed	Comment is noted. Monitoring would be completed as needed per Minnesota Rules, chapter 7050.0220 subpart.3a.	Follow-up: Please include 10 mg/L wild rice sulfate standard in EAW Requested Action: Edit text to address comment.	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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
622	14.b	1823	Will baseline data collection be included in the EIS? It would be beneficial to include pre-mine wild rice status. Requested Action: Edit EAW, Include analysis in EIS	Comment is noted. Data and analyses collected and conducted in support of the Project would be included with the EIS data submittal.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
623	14.b	1823	Wild rice may also be present in non-public waters. Requires thorough survey potential habitats downstream of project. Requested Action: Advisory only;	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.	Resolved. Requested Action: None.	

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			future discussion item as part of developing the Draft Scoping Decision Document					
624	14.b	1830	Bulk treatment of plant communities. Peatlands can often have unique and sensitive plant species. The EIS will need additional information about types of peatlands present to assess potential project impacts on peatland plant communities. 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.	Resolved. Requested Action: None.	
625	14.c	1845	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. Requested Action: Include information on these types of biota and how they will be impacted by the Project.	Comment is noted. 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.	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.	Resolved. Requested Action: None.	
626	14.c	1845	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 Requested Action: Discussion topic	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
632	14.c	1876	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. Requested Action: Consider comment; edit figure and/or text as warranted.	Comment is noted. 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. As stated in the EAW data submittal: "While impacts to wild rice lakes are not anticipated from the Project, a baseline wild rice habitat delineation is being conducted for	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.	Resolved. Requested Action: None.	

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				the Project in downstream waterbodies."				
634	14.c	1880	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. Requested Action: Address comment; modify text as warranted.	Comment is noted.	Follow up--Unclear how noting the comment addresses the comment? Perhaps an issue for further discussion? Requested Action: Identify how this issue will be addressed in EIS.	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.	Resolved. Requested Action: None.	
635	14.d	1890	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. Requested Action: Address comment. Modify text as needed	Comment is noted. See Response to Comment #625.	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.	Resolved. Requested Action: None.	
636	14.d	1890	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	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.	Resolved. Requested Action: None.	

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			potential for impacts to aquatic biota. Please provide data to support the statement in line 1890. Requested Action: Address comment. Modify text as needed					
637	14.d	1890	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. Requested Action: Address comment. Modify text as needed	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.	Resolved. Requested Action: None.	
638	14.d	1890	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. Requested Action: Address comment. Modify text as needed	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.	Resolved. Requested Action: None.	
639	14.d	1893	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. Requested Action: Address comment. Modify text as needed	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.	Resolved. Requested Action: None.	

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640	14.d	1894	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. Requested Action: Address comment. Modify text as needed	Comment is noted. See Response to Comment #626.	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.	Resolved. Requested Action: None.	
641	15	1899	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. Requested Action: Advisory. Future Discussion topic for development of Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
647	6.b	1910	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. Requested Action: Advisory only; edit text if warranted.	Comment is noted.	Have any existing buildings on the property been for evaluated for any potential historical significance? If not, should be included in EIS Requested Action: Answer question; Modify text as necessary.	Thank you for your comment. The following language has been added to the EAW: 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]"	Resolved. Requested Action: None.	

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648	13	1910	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. 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.	Resolved. Requested Action: None.	
649	15	1911	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. Requested Action: Address comment. Modify text as needed	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.	Resolved. Requested Action: None.	
650	15	1923	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. Requested Action: Address comment. Modify text as needed	Comment is noted.	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 Requested Action: Add text to address comment.	Thank you for your comment. The following language has been added to the EAW: 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]"	Resolved. Requested Action: None.	

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651	15	1924	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. 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.	Resolved. Requested Action: None.	
652	15	1929	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. Requested Action: Consider comment; edit figure text as warranted.	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.	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.	Resolved. Requested Action: None.	

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653	15	1929	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 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.	Resolved. Requested Action: None.	
654	15	1930	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. Requested Action: Consider comment; edit figure and/or text as warranted.	Comment is noted. Figure 6 was updated to include land ownership.	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.	Resolved. Requested Action: None.	
655	15	1935	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. 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.	Resolved. Requested Action: None.	

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656	15	1938	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. 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.	Resolved. Requested Action: None.	
657	15	1938	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	Comment is noted. See Response to Comment #652.	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.	Resolved. Requested Action: None.	

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			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. Requested Action: Answer question. Edit text as necessary					
658	16	1946	A figure/map showing surrounding cover types and locations of residences/other mentioned sites would be useful Requested Action: Consider comment; edit figure and/or text as warranted.	Comment is noted and will be taken under consideration.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
659	16	1963	Why are nighttime operations required? I would expect most of the light and noise pollution to be an issue at night and impacts would be minimized if those hours were avoided Requested Action: Answer question. Edit text as necessary	Various mitigation measures will be taken to address nighttime noise and light impacts, which will be further evaluated as part of the EIS. Nighttime operations are necessary because producing ore at the planned annual rate while operating only during daytime hours would require twice as much equipment operating simultaneously, much larger surface infrastructure to accommodate the much higher hourly throughput, a larger physical site footprint, greater	Follow-Up: Review of noise and light impacts from proposed project remain a concern. Review of these issues will continue in future submittals. Requested Action: Advisory only; to be discussed in the development of the DSDD.	Thank you for your comment. This is a future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	

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				traffic congestion, and ultimately higher overall environmental impacts.				
660	16	1998	The viewshed analysis should be performed for a "with trees" and "without trees" scenarios. The EAW state that the tallest building is 78 feet. If temporary features (e.g. construction cranes) are taller than 78 feet, then the height of the tallest feature should be used in the analysis. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
661	6.b	1999	Back at Item 6b at Line 528, the project description notes that an estimated up to 450KCY tons per year could be sourced aggregate, which translates to approximately 35 trucks per day with a 35 tons per truckload. Once this traffic enters the property, potential emissions could be considered in the: risk assessment; Class I modeling; Class II modeling. This traffic could be assessed as part of tailpipe on/offsite for GHG. Requested Action: Consider comment and edit document as current information allows. Future discussion item for development of Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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662	6.b	1999	Regarding the treatment of off-site aggregate in Item 6b at Line 526, bringing it on-site would need to be characterized within plan for air quality impacts. This would include, but be not limited, to haul road traffic, unloading, reloading, air emission estimates from dust and tailpipe emissions, and operating hours. Requested Action: Advisory only. Future discussion issue for 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.	Resolved. Requested Action: None.	
663	17.c	1999	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. Requested Action: Address comment and update EAW as appropriate.	An inventory of point and mobile sources will be developed, as necessary, as part of the EIS data submittal and air permitting.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
664	23	1999	Underground mobile equipment emissions may be required to be categorized as point or stationary sources by MNR for Air Permitting purposes. Requested Action: Regulatory guidance. Future discussion item.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
669	17.a	2007	Will the portals be located far enough apart that the intake air will not be recirculating the mine exhaust? Provide data to support this. Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	See Response to Comment #167.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
670	17.a	2007	Will there be any baseline monitoring for ambient air prior to construction? Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	Currently, the Project considers existing State of Minnesota ambient air monitoring data to be sufficient for the project. The Project is not proposing to do any additional ambient air monitoring.	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.	Resolved. Requested Action: None.	

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				The Project is planning on using MPCA/EPA baseline data.				
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
676	17.a	2021	Elongate Mineral Particle assessment results were not included. NIOSH defines EMP as any mineral particle with a minimum aspect ratio of 3:1 and length > 0.5 um (NIOSH Bulletin 62, 2011). Describe method for sampling and analysis for the presence of EMPs. Requested Action: Address comment on EMP. Methodology is a future discussion item considered in development of Draft Scoping Decision Document.	A material characterization program is under way, The Project will have a complete EMP data set to inform 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.	Resolved. Requested Action: None.	
677	6.b	2022	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? Requested Action: Answer question; modify text as needed. Future discussion item in development of Draft Scoping Decision Document.	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.	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.	Resolved. Requested Action: None.	

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678	6.b	2022	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). 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.	Resolved. Requested Action: None.	
679	6.b	2022	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. 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.	Resolved. Requested Action: None.	

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680	6.b	2022	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? Requested Action: Answer question. Future discussion item where the response can be considered in development of the 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.	Resolved. Requested Action: None.	
681	6.b	2022	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? Requested Action: Consider comment; modify text to address the issue.	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.	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.	Resolved. Requested Action: None.	
682	6.b	2022	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. Requested Action: Advisory only. Future discussion in development	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.	Resolved. Requested Action: None.	

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			of Draft Scoping Decision Document.					
683	6.b	2022	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. 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.	Resolved. Requested Action: None.	
684	17.a	2022	Will there be additional air emission treatments during or after explosions? How will these differ from other operations ventilation? Requested Action: Answer question.	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.	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.	Resolved. Requested Action: None.	
689	23	2022	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. Requested Action: Answer question.	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.	Resolved. Requested Action: None.	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.	Resolved. Requested Action: None.	
694	17.a	2056	Describe type and quantity of HAP expected. Provide sampling method and analysis data used to determine this.	The Project is planning on using EPA factors for internal combustion engine emissions, and data from the material characterization program	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.	Resolved. Requested Action: None.	

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			Requested Action: Answer question.	(conducted under an agency-approved work plan) for the ore and backfill materials.				
695	17.a	2058	Is there a contingency plan if mercury is found to be contained in the ore and emitted? Requested Action: Answer Question. Future Discussion Item as part of developing the Draft Scoping Decision Document	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.	Follow-up: Further review of Material Characterization Program when available will be necessary to evaluate constituents of concern. Requested Action: Update text if possible. Otherwise, future discussion item as part of developing the 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.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: None.	
699	6.b	2068	The railway spur will need to be evaluated against the ambient air boundary. Requested Action: Advisory only.	Comment is noted.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
700	17.a	2075	Will vehicle emissions be included in air modeling that is used to support a health risk assessment? Requested Action: Answer question. Future topic of discussion for treatment of health issues in development of Draft Scoping Decision Document.	The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
701	17.a	2075	Pursuant to the question about dust and odors and the effects thereof on sensitive receptors and quality of life, briefly discuss how health risk assessment will be used to address fugitive dust and odors. Requested Action: Answer question. Future topic of discussion for treatment of health issues in development of Draft Scoping Decision Document.	The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
705	17.c	2092	Dust and Odors section did not mention nearby sensitive receptors/quality of life impacts. Sensitive receptors should be identified/referenced as well as whether they could be expected to experience dust/odor impacts. Requested Action: Answer question. Future topic of discussion for treatment of community health issues in development of Draft Scoping Decision Document.	The Project will address this question, as necessary, in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
707	17.c	2097	A Fugitive Dust Control Plan is forthcoming in EIS. No dust control plan prepared yet. Recommend review of NIOSH Dust Control Handbook for Industrial Minerals Mining and Processing (NIOSH, 2019) in preparation of your Fugitive Dust Control Plan. Plan for sampling and analysis of types and quantity of fugitive dust has not been presented. Requested Action: Note comment. A Fugitive Dust Control Plan will be presented in the EIS.	Comment is noted. The Project will address, as necessary, this issue in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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708	17.c	2105	Will there be monitoring or confirmation testing that the air is being scrubbed sufficiently of dust and particulates? What specific standards will be applied when determining if suspended dust/particulates have been sufficiently reduced? Requested Action: Answer Question; future discussion topic for development of Draft Scoping Decision Document	Required compliance air monitoring procedures will be determined during the permitting process. The Project will meet the Clean Air Act ambient air quality standards.	Not Resolved. If monitoring/mitigation/dust control methods are not yet determined, state when those decisions will be made (i.e. permitting process) and what will inform those decisions. Stating within the document which specific standards will be met is useful too (i.e. Clean Air Act ambient air quality standards). Requested Action: Add text to address comment.	Thank you for the comment. The EAW has been modified as follows: 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." 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]"	Resolved. Requested Action: None.	
709	17.c	2107	Describe visible emission inspection procedure. Describe specific location, frequency, and method for inspections (example: daily fence line measurements using PM2.5 instrumentation) Requested Action: Note for Fugitive Emissions Plan in EIS	Required compliance air monitoring procedures will be determined during the permitting process. The Project will meet the Clean Air Act ambient air quality standards.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
710	17.c	2109	Describe frequency of dust suppressant application. Describe criteria for use of additional chemical dust suppressants, if needed. Requested Action: Note for Fugitive Emissions Plan in EIS	Specific procedures related to dust suppressants for fugitive emission controls will be addressed in the fugitive dust control plan created for permitting.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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711	18.a	2117	Peat wetlands are an important carbon store. Draining them and/or using peat as soil amendments where it can decompose releases carbon dioxide. Assessment of land use change based GHGs should include disturbed peatlands. Requested Action: Edit document as needed to address comment. Further discussion of issue for treatment in 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.	Resolved. Requested Action: None.	
712	23	2117	Would the lifetime GHG emissions include the 1-2 years of construction + 10 years of operation + ?? Years for closure. A timeline discussion would be valuable here. Requested Action: Answer question.	The Project looks forward to future discussions on this topic and will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
713	18.a	2123	Odors from water treatment and the storm water pond should be considered within this section. Requested Action: Consider comment; edit figure and/or text as warranted.	The Project looks forward to future discussions on this topic and, if necessary, will address this question in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
714	18.a	2140	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.	Resolved. Requested Action: None.	
715	18.a	2141	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.	Resolved. Requested Action: None.	
716	18.a	2148	"a. GHG Assessment" should be "b. GHG Assessment" Requested Action: Edit EAW	Document has been revised to correct this typographical error.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
718	18.b.i	2149	Other aspects of construction should be discussed in this section. Have emissions from temporary water treatment and emergency generators been considered in the GHG calculations? Requested Action: Consider comment; edit text as warranted.	These items would be included in the GHG emission source categories listed on lines 2127 and 2131 of the initial Project Description. The Project will further address this question, as necessary, in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
723	21	2163	Would this be land application from the water treatment plant or the peat relocation? Depending on the product and use, this could require a Land Application Permit (not listed in Section 9). More information and elaboration on this is needed. Requested Action: Respond to comment; edit document as needed.	Currently there are no plans to land apply peat or water treatment plant residuals. The Project will address this issue, as necessary, in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
725	18.b.iii	2173	GHG emissions from water treatment should be considered and discussed in this section. Requested Action: Consider comment; edit text as warranted.	The Project will address this question, as necessary, in the EIS.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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726	6	2179	DNR notes the Draft Scoping Decision Document would likely account for the numerous stationary and mobile noise sources in models of daytime and nighttime activity, with results required to be compared with measured daytime and nighttime noise levels (to assess increase over existing and potential annoyance) and MPCA daytime and nighttime Noise Standards to address compliance with MPCA noise standards. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document and noise/vibration impact assessment work plan.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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733	6.b	2190	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. 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.	Section 19 of the document has been updated to include the TBM.	Resolved Requested Action: None.	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.	Resolved. Requested Action: None.	
734	19	2191	Noise impacts of blasting and TBM operation should be discussed in detail. Requested Action: Consider comment; edit text as warranted.	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. 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.	Resolved Requested Action: None.	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. 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]"	Resolved. Requested Action: None.	

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				See Response to Comment #109 regarding blasting. These items will be evaluated in further detail for the EIS.				
735	19	2195	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. 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.	Resolved. Requested Action: None.	

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736	19	2200	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. 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.	Resolved. Requested Action: None.	
737	19	2200	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. Requested Action: Consider comment; edit text as warranted.	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.	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.	Resolved. Requested Action: None.	
738	19	2200	At a minimum there should be daytime and nighttime noise models for construction, opera ration, and closure. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
739	19	2200	The EIS should evaluate construction noise levels using FHWA/FTA methods that identify equipment and noise levels used during each phase of construction and closure. The assessment of noise from construction and closure should be detailed and reflect actual equipment likely to be used.	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.	Resolved. Requested Action: None.	

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			Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document					
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.	Resolved. Requested Action: None.	
742	19	2205	Potential noise reduction associated with vegetated strips does not correctly reflect what Reference 50 says. Reference 50 oversimplifies acoustical absorption by vegetation and is not an appropriate reference for this project. Requested Action: Address comment; modify text as warranted.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
743	19	2208	Details of various barrier options should be discussed as well as why chosen option(s) were selected over others (e.g. trees vs berm etc..). Requested Action: Address comment. Future discussion topic	The Project looks forward to future discussions on this topic and will address this issue, as necessary, in the EIS.	Resolved at this stage. To be discussed in development of the SEAW/DSDD and EIS. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
749	21.a	2255	RGU notes that it remains to be determined what project impacts would operate at a geographic scale and timeframe that may interact with other projects, including land management activities. Requested Action: Advisory only;	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.	Resolved. Requested Action: None.	

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			the issue will be explored over the development of the scoping EAW and Draft Scoping Decision Document.					
750	21.a	2255	RGU notes that even though current condition typically provides a good representation of past actions or activities, it may be necessary to detail previous development. Requested Action: Advisory only; the issue will be explored over the development of the scoping EAW and Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
751	21.a	2258	The EIS scope may include discussion of the surrounding community, its sociodemographic, environmental justice, and human health issues. Requested Action: Advisory only; future discussion item in development of the Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
752	21.a	2266	RGU notes consideration may be given to adding tribal lands and ceded territories. Requested Action: Advisory only; future discussion item in development of the Draft Scoping Decision Document.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
755	21.b	2279	As noted in Item 6b at Lines 894-898, the RGU will be required to consider whether other reasonably foreseeable actions meet EQB's guidance as future mining activity requiring consideration for potential cumulative effects. Requested Action: Advisory only; future discussion item as potential impacts are better understood in development of scoping documents.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved at this stage. To be discussed in development of the SEAW/DSDD. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
758	22	2293	Scoping could include consideration of Environmental Justice issues that may be associated with the project. Requested Action: Advisory only; future discussion item as potential impacts are better understood in development of scoping documents.	Comment is noted. Future discussion item, as necessary, in development of DSDD.	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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
760	23	2306	Should add the following reference Current Records -- Map -- https://osaportal.gisdata.mn.gov/CurrentRecordsMap -- 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.	Resolved. Requested Action: None.	
761	23	2306	Should add the following reference Tribal Directory Assessment Tool -- https://egis.hud.gov/tdat/ -- July 1, 2023 Requested Action: Edit document.	The Project only included references for sources used in the writing of the document.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
762	23	2306	Should add the following reference -- National Register of Historic Places -- Database Research -- https://www.nps.gov/subjects/nationalregister/database-research.htm -- July 1, 2023 Requested Action: Edit document.	The Project only included references for sources used in the writing of the document.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
763	23	2391	A discussion regarding the increase of traffic and rail usage to the area should be discussed within the cumulative impacts section in	Comment is noted. Future discussion item, as	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.	Resolved. Requested Action: None.	

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			association to GHG and air emissions. Requested Action: Advisory only; future discussion item in development of the Draft Scoping Decision Document.	necessary, in development of DSDD.				
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.	Resolved. Requested Action: None.	
765	13	General	Risk assessment is an important tool for developing waste management programs for hazardous and non-hazardous wastes. Risk assessment information can be used to inform waste minimization programs, support applications for operating permits, and assess the need for cleanup actions, including setting cleanup goals. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document	Comment is noted. Future discussion item, as necessary, in development of DSDD.	Resolved. Requested Action: None.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
766	15	General	The cultural resources inventory report should include a comprehensive and near-exhaustive overview of the prehistoric/protohistoric, early historic, and historic developments in the Tamarack region. The text should also note that the National Register-listed Sandy River Lumber Company Horse Barn is located south of Tamarack. Exact location of the property in relation to the project area will need to be	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.	Resolved. Requested Action: None.	

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			provided. Requested Action: Address comment. Modify text as needed. Future discussion topic for Draft Scoping Decision Document					
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.	Resolved. Requested Action: None.	
768	17	General	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? Requested Action: Answer Question; future discussion topic for 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.	Resolved. Requested Action: None.	
771	21	General	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. 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.	Follow-up. Review how comment addressed in development of DSDD. Requested Action: Advisory	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Resolved. Requested Action: None.	
772	All EAW	General	There is no mention of Ecosystem Services Valuation in the EAW document. EIS Scoping should address Ecosystem Services Valuation in detail. Requested Action: Advisory only; future discussion item as part of developing the Draft Scoping Decision Document. Likely	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.	Resolved. Requested Action: None.	

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			considered as part of socioeconomic analysis.					

Round Two Comment Response Table

Comment No.	EAW Item No.	EAW v2 Line 1	Round 2 RGU Comment to Talon and Requested Action 02/04/2024	Talon Response and Treatment in EAW 12/12/2024	Round 3 RGU Response and Request to Talon 04/10/2025	Talon Response and Treatment in EAW 06/23/2025
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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
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.	Resolved. Requested Action: None.	
811	6.b	383	Change "may" to "would" for consistency. Requested Action: Edit text as requested.	The text of the EAW has been edited as requested. 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]" 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]."	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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889	6.b	625	RGU notes it is premature to determine that 0.2 in. deflection is negligible. Please clarify if the 0.2 in subsidence is an average across the whole mine area. If it is an average, describe the range and deviation. Requested Action: Consider comment; modify text as warranted.	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	Commenter unable to participate in Round 3. Requested Action: None at this time.	
897	6.b	640	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. Requested Action: Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
947	6.b	736	If known, would air scrubbers or fabric filters better control dust emissions? Requested Action: If known, answer question and update EAW accordingly.	Thank you for your comment. The project team has selected to use wet scrubbers on the mine exhaust.	Resolved. Requested Action: None.	
950	6.b	750	RGU notes that exploration of an alternative location of the rail spur (e.g., along road) may be part of the scoping decision. Requested Action: Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
951	6.b	756	Graphic 1 depicts a double rail line for the rail spur, but it is stated here that it would be primarily single track. Please clarify this discrepancy Requested Action: Consider comment; modify text as warranted.	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). 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.	Commenter unable to participate in Round 3. Requested Action: None.	

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952	6.b	764	If known, describe what known contaminants in the contact water are and how they would be treated. Requested Action: Consider comment; modify text as warranted.	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.	Resolved. Requested Action: None.	
975	6.b	845	RGU notes that the Contact Water Treatment Plant plan will need to be determined for evaluation in the EIS. Requested Action: Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
985	6.b	885	Clarify what is meant by "the watershed near the northern boundary". Requested Action: Edit text as requested.	Please see the response to comment number 983.	Resolved. Requested Action: None.	
988	6.b	906	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. Requested Action: Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
989	6.b	908	Expected volume is an important component with comparison to current flow regime of the Tamarack River and the connecting tributary. Requested Action: Consider comment; modify text as warranted	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 Question12 Water Resource.	Commenter unable to participate in Round 3. Requested Action: None at this time.	

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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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
1025	7.a	1139	Advisory Requested Action: Consider comment; edit text as warranted.	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.	Resolved. Further discussion will take place as necessary during EIS review. Requested Action: None.	

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1036	7.b	1192	Table 5 project info: Rail line thru wetland may alter capacity and route of water thru that wetland. Requested Action: Consider comment; modify text as warranted.	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), where wetland and hydrology impacts will be assessed comprehensively.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
1052	10.a.i	1228	Should mention that the project is in close proximity to the 1854 Ceded Territory (needs consideration when looking at potential impacts from project), especially since one of the explored ore deposits is within the 1854 Ceded Territory, even though it is not currently proposed. Requested Action: Consider comment; modify text as warranted.	Thank you for the comment. Please see the response to comment 387. 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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
1053	10	1230	Land use description should provide greater context of the surrounding area within the watersheds. A description of other important land areas, such as WMAs and State Parks, downstream of project area would be appropriate to frame where indirect impacts may occur or need to be monitored. Requested Action: Consider comment; modify text as warranted.	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. The edit to the EAW is as follows: 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]"	Resolved. Requested Action: None.	

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1054	10.a.i	1230	Proposed railroad alignment crosses two types of DNR Forestry administered state lands: Consolidated Conservation (Con-Con) and School Trust lands Requested Action: Modify text to address comment.	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: 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]"	The two state land types are distinct. The proposed text makes it sound like the Trust land is in a conservation area, which it is not. Advise for Figure 10 to be split into a zoning figure and a state/county lands figure. For the text in question, recommend changing to " (New) Figure 11 also shows tax forfeited county-administered lands, state-administered School Trust lands and state-administered Consolidated Conservation Area lands." Requested Action: Split figures and modify text.	Thank you for the comment. **EDIT** **Original** "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]" **Modified** Figure 10 also shows tax-forfeited county-administered lands, state trust lands, and state-administered lands within the consolidated conservation (Con-Con) area. [R2_Cmt_#1230]
1055	10.a.i	1237	Water in ditches flow to the Tamarack and then Prairie Rivers, which is a major tributary to Big Sandy Lake Reservoir that outlets into the Sandy River and then to the Mississippi River. Big Sandy is the most used surface waterbody completely within Aitkin County, and significant commercial, recreational, and residential development. Requested Action: Consider comment; modify text as warranted.	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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
1061	11.b	1147	DNR notes the DSDD will likely require assessment on the potential for altered hydrology to influence water levels. Lower water levels could lead to impacts on peat and muck soils such as decomposition leading to higher GHG emissions and altered habitat conditions. Requested Action: Advisory only; future discussion issue for development of Draft Scoping Decision Document.	Comment is noted. This will be considered as a future discussion item, if necessary, in the development of the Draft Scoping Decision Document (DSDD).	Resolved. Requested Action: None.	
1062	11.a	1296	Surficial geology description does not provide enough detail. Please include sources for information. May want to consider adding cross section of quaternary aged sediment. Requested Action: Consider comment; modify text as warranted.	Please review comment number 403. The RGU indicated for a similar comment previously that it was resolved.	Resolved. Further discussion will take place as necessary during EIS review. Requested Action: None.	

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1063	11.a	1296	May want to consider organizing description of sediments by age (i.e. Holocene sediments (Peat), Late-WI), acknowledging a complex or suite of sediments within an age is ok. Requested Action: Consider comment; modify text as warranted.	Thank you for your the comment. The comment has been considered.	Resolved. Further discussion will take place as necessary during EIS review. Requested Action: None.	
1064	11.a	1296	May want to further analyze or specify area of surficial disturbance and types of sediment that will be encountered. Requested Action: Consider comment; add text as warranted.	Thank you for your the comment. The comment has been considered.	Resolved. Further discussion will take place as necessary during EIS review. Requested Action: None.	

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1065	11.a	1312	Please include more detail about the bedrock characterization and associated mineralization at depth, include cross sectional information (what units are encountered at what depth), as well as any structural features that are encountered. Requested Action: Add text as requested.	Thank you for your comment. The following text has been added to the EAW: 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]"	Resolved. New comment issued on Round 3. Requested Action: None.	
1066	11.a	1312	Please include more detail about bedrock competency by rock type. Requested Action: Add text as requested.	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).	Follow-up comment: Only very general information on competency included. "In general, the intrusive body is massive, competent rock." Is there a weathered and/or fractured zone present at the surficial/bedrock contact? Requested Action: Answer question; modify text as warranted.	**EDIT** **Added Language** In general, the intrusive body is massive, competent rock with increased local fracturing near the basal contact. The intrusion shows a small weathering profile at bedrock surface and decreases with depth.
1067	11.a	1312	Please include cross-sectional information to better characterize overburden thickness and bedrock units. Requested Action: Add text as requested.	A cross section (Graphic 11-1) of the intrusive body was added to the EAW.	Resolved. Requested Action: None.	

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1077	12	1376	The scope of the water quality and water level monitoring is unclear from the document. An overview of this monitoring area should be provided. Requested Action: Consider comment; modify text as warranted.	Please see the response to comment number 440.	Resolved at this stage. To be discussed in development of DSDD. Requested Action: Comment 440 is in Round 1 and was deemed resolved at this stage. If commenter needs additional information, please write a new comment for the next round of review.	Requested Action by RGU indicates that the comment was resolved.
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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
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]	Commenter unable to participate in Round 3. Requested Action: None at this time.	
1089	12.a.i	1434	DNR notes the TMDL will likely be an important source of information. Analysis likely to include: wetlands due to ditching, municipality and ag wastewater, and increased runoff and septic from developed properties as ditching is affecting both the channel erosion and release of nutrients from wetlands. It will be necessary to understand any potential interaction with the project and its impacts. Requested Action: Advisory only. Likely an issue identified in v1SEAW for analysis in the EIS. TMDL likely to be identified as an available information source in v1SEAW.	Talon has reviewed this comment in light of the amended design and has determined that the original response is still appropriate.	Commenter unable to participate in Round 3. Requested Action: None at this time.	

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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 cool water 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.	RGU will follow up with Talon regarding this comment. Resolved for now. Requested Action: None.	
1113	12.b.i	1599	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). Requested Action: Advisory only. Future discussion item for data requirements for SEAW, including figures.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
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]"	Commenter unable to participate in Round 3. Requested Action: None at this time.	

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1156	14.a	1985	Add in Land Type Association (LTA) to add finer scale ecological context. LTAs capture finer scale information on landforms, soils, topography and vegetation. Requested Action: Advisory only; to be discussed in draft scoping decision document	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved. Requested Action: None.	
1158	14	1994	Assuming one of the ditches is that proposed to receive the treated wastewater discharge, the PCA sampled the unnamed ditch (un-named trib) mentioned in v2 line 1203, and found pike, burbot, white sucker and central mudminnow. Requested Action: Consider comment; modify text as warranted.	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.	Report and data will be provided to talon. Comment considered resolved. Requested Action: None.	
1160	14.a	1995	DNR notes that habitat suitable for fish "not present" would still likely support dace and mudminnow if nothing else. This same ditch/unnamed creek at downstream point has been sampled by MPCA and found gamefish too, including northern pike and burbot. It is very possible/likely that northern pike spawn in these flooded wetlands in spring. This information will need to be verified for use in the EIS. Requested Action: Advisory only.	Thank you for your comment. Please see the response for comment number 1158.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
1161	14.a	2003	More detailed information about survey data being collected, scope of the survey work and how indicators were selected should be provided. Requested Action: Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Resolved. Requested Action: None.	
1162	14.a	2003	Provide a more detailed description of the natural resource surveys. Please address the following: 1) geographic scope, does it extend beyond the immediate project area? 2) what survey methods will be used for different taxa and plant communities. Requested Action: Answer questions; modify text as warranted.	Thank you for your comment. Additional descriptions of natural resource surveys will be discussed, as necessary in the development of Draft Scoping Decision Document.	Resolved. Requested Action: None.	

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1163	14.b	2005	NHIS may not indicate state listed species in project area due to lack of survey, this may be needed to confirm presence or absence of suitable habitat or species presence. This should be acknowledged in the document. Requested Action:	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.	Resolved. Requested Action: None.	
1165	14.b	2011	There is no mention of state listed species in this section. Sharp-tailed grouse, sandhill cranes and trumpeter swans must be present along with a number of other vertebrate and invertebrate species. Requested Action: Consider comment; modify text as warranted	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. 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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
1167	14.b	2055	Wild rice is also found in downstream rivers and streams. Prairie River has significant rice stands. Requested Action: Consider comment; modify text as warranted	Thank you for your comment. The EAW has been updated to include rivers and streams. Please see the response to comment number 1085.	Commenter unable to participate in Round 3. Requested Action: None at this time.	

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1173	14.c	2086	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. Requested Action: Consider comment; modify text as warranted	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. 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: 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. " 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]"	Resolved. Requested Action: None.	
1177	14.c	2106	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. Requested Action: Advisory for future discussion.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved. Requested Action: None.	
1179	14.c	2114	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. Requested Action: Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.	Resolved. Requested Action: None.	

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1181	14.d	2121	The rail line would likely have impact on local populations of small mammals. Requested Action: Consider comment; modify text as warranted	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. 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." 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. 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: 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. " 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	Commenter unable to participate in Round 3. Requested Action: None at this time.	

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				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]"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. 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: 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. " 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]"		

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1182	14.d	2124	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. Requested Action: Consider comment; modify text as warranted	Thank you for your comment. The following language was added to the EAW: 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." 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]" "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]"	Commenter unable to participate in Round 3. Requested Action: None at this time.	
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.	Resolved at this stage. Further discussion item as part of the DSDD. Requested Action: None.	

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1196	16	2209	Visual impacts from Savanna Portage State Park should be evaluated for impacts to Dark Skies and mitigations made if necessary Requested Action: Modify text to address comment.	Thank you for your comment. The EAW has been edited to include this text: 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]"	Resolved. Requested Action: None.	
1218	17.c	2335	Will fugitive dust contaminate water? If so, with what pollutants and how will water be treated before discharging to the environment? Requested Action: Answer questions; modify text as warranted.	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.	Commenter unable to participate in Round 3. Requested Action: None at this time.	
1223	18.a.iii	2418	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. Requested Action: Advisory only; future discussion item as part of developing the 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).	Resolved at this stage. Further discussion item as part of the DSDD. Requested Action: None.	

Round Three New Comments Table

Comment No.	EAW Item No.	EAW v3 Line 1	Table, Figure, Graphic	Round 3 RGU Comment to Talon 04/10/2025	Requested Action by RGU	Talon Response and Treatment in EAW 06/23/2025
1251	6.a	388		Talon has not indicated that it has procured any contracts for EV battery manufacturing. With no contracts in place, this should only reference "industrial uses."	Modify EAW to address comment.	Talon has entered into an agreement with Tesla Inc. (“Tesla”) purchase 75,000 metric tonnes (165 million lbs) of nickel in concentrate, to be produced from the Tamarack Mining Project. Nickel has been designated as a critical mineral by the U.S. government since 2022, and demand for high-purity nickel—driven by both EV battery, industrial, and defense applications—is projected to grow significantly, ensuring ample market demand for Tamarack’s production
1252	6.b	400		Has there been any change since 2023?	Answer question; modify text as warranted.	Talon's ownership of the Tamarack Project remains unchanged.
1253	6.b	408		The Draft Scoping Decision will likely require the EIS to provide an overview of financial assurance requirements, including describing potential financial assurance instruments and a preliminary estimate of financial assurance costs.	Advisory. To be covered in EIS.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1254	6.b	417		Explain the rationale for the 1.5 acres industrial stormwater pond. Was it calculated for the 65.1 acres of mostly impervious industrial stormwater runoff (if this is the case, the pond appears to be undersized), or is it due to the available area for stormwater treatment?	Answer question; modify text as warranted.	Thank you for your inquiry. The 1.5 acre industrial stormwater pond referenced is in addition to the repurposing existing 2.3 acre flooded borrow pit to an Industrial stormwater pond. Table 6.1 shows the existing excavated pond acreage and Table 6.8 indicates the total acreage as 3.8 acre. Graphic 6.2 *Tamarack Mine Surface Infrastructure from the Northwest* and Figure 3 *Site layout* identifies the location for the two industrial stormwater ponds. Stormwater from the mine site (38.9 acres) would be directed to the two industrial stormwater ponds.
1255	6.b	439		Please, clarify what is meant by the phrase "...the areas would be designated as originally intended." The sentence is in reference to the temporary staging areas and meant to address a round 2 comment. Does "originally intended" mean open storage space, or ecologically restored? Please clarify.	Answer question; modify text as warranted.	Thank you for your comment. The referenced sentence has been revised to improve clarity. The intent is to indicate that, following construction, the temporary staging areas would be reclaimed to reflect their pre-construction use or condition, rather than being retained for open storage or other permanent uses. **Old** The plant and equipment temporarily stored in staging areas during construction would be removed after construction, and the areas would be designated as originally intended. **New** The equipment stored in temporary staging areas during construction would be removed following construction, and the areas would be reclaimed to their pre-construction use or condition. [R3_Cmt_#1255]

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1256	6.b	469	Graphic 6.2	The Contact Water Treatment Building is 42,000 sq. ft. (see Line 1747). There is no storage area for contact water/wastewater shown other than the Building. The peak-of-mine inflow calculation is 800-1600 gpm (Lines 2352-2353). Are there provisions for contact water storage at the Contact Water Treatment Building or another part of the site?	Answer question; modify text as warranted.	Thank you for your comment. The contact water management system is being designed to manage variability in inflows, including storage capacity and throughput flexibility. Additional details regarding the contact water treatment plant will be provided during the Environmental Impact Statement (EIS) process.
1257	6.b	469	Graphic 6.2	Based on the illustration example, it appears the site can hold only about 75 rail cars on site, not 120. Additionally, when loading, it appears only 4 or 5 rail cars will be in the indoor facility. If this is correct, how will the ore to be railed out be protected from the weather?	Answer question; modify text as warranted.	Thank you for your comment. The illustration provided in the EAW is intended to depict layout and function rather than the full operational capacity of the rail yard. Please see Section 6.21.1 Rail Yard of the Environmental Assessment Worksheet (EAW) for a detailed explanation of rail yard layout, ore loading operations, and measures to protect ore during handling and transport. The following provides a brief summary of information contained in that section: The rail yard is designed with three parallel tracks, each capable of accommodating a full unit train length of covered railcars. Ore is loaded using an index railcar loading system within the fully enclosed Ore Transfer Building. Each railcar is moved under the load point, filled to its optimum weight using a conveyor and track scale system, and covered inside the building. This process ensures that ore is not exposed to the weather.
1258	6.b	505		RGU notes that the Draft Scoping Decision will likely require the assessment of environmental effects associated with the rail spur and associated transportation should be analyzed as a part of this Project.	Advisory only.	Thank you for your advisory comment
1259	6.b	551		Please indicate the expected length of railway spur that will require peat excavation and conversion to upland, the expected width required to construct upland for the railway, and the estimated volume of peat that will be extracted. What will be done with the excavated peat?	Answer question; modify text as warranted.	The precise scale of wetlands that will be converted to uplands for the railway spur will be determined by the ongoing engineering supporting the Proposer's Feasibility Study. As described in Section 6.17 Overburden, Waste Rock, and Backfill Materials Management of the Environmental Assessment Worksheet (EAW), overburden excavated during construction—which includes peat—would be transported offsite to an appropriately licensed landfill. There are no dedicated peat stockpiles being proposed in the current design.
1260	6.b	551		Please indicate for what time of year is peat excavation planned	Modify EAW to address comment.	Thank you for your comment. The timing of peat excavation depends on a range of construction planning factors, including contractor availability, site access, and the timing of permit receipt. While peat removal is anticipated to occur during early civil construction activities, specific timing has

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						not yet been finalized. This topic will continue to be refined through ongoing project planning and may be addressed in greater detail during the Environmental Impact Statement (EIS) process.
1261	6.b	551		RGU notes that placement of coarse rock and culverts could create preferential flow paths, interrupting diffuse flow characteristic of peatland hydrology. It is likely that the Draft Scoping Decision would require assessment of these indirect impacts in the EIS.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1262	6.b	551	Figure 3	Figure 3 shows a road constructed across wetlands for access to Surface Raise #1. The text beginning at line 551 discusses conversion of wetlands to uplands for the railway spur. It is assumed similar methods would be used to construct the access road shown in Figure 3. Please include a discussion of conversion of wetland to uplands for this road and describe the methods that would be used to minimize wetlands impacts.	Modify EAW to address comment.	Thank you for your comment. The following content has been added to the draft EAW: **EDIT** **Added Language** The conversion of the wetlands to uplands for the access road 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. [R3_Cmt_#1262]
1263	6.b	551		A full analysis of the filling of the wetlands should be conducted including impacts to wild rice, fish habitat, and other wildlife.	Advisory. To be covered in EIS.	Thank you for your comment. This topic may be considered by the Responsible Governmental Unit (RGU) as part of the Environmental Impact Statement (EIS) process.
1264	6.b	551		EAW states that areas of shallow peat would be excavated and replaced with fill material, while limited areas of deeper peat would require installation of piles. Where and how would excavated peat be stored? Would peat storage be lined to prevent discharge of mercury, methylmercury, or other contaminants?	Answer question; modify text as warranted.	Thank you for your comment. As described in Section 6.17 Overburden, Waste Rock, and Backfill Materials Management of the Environmental Assessment Worksheet (EAW), overburden excavated during construction—which includes peat—would be transported offsite to an appropriately licensed landfill. There are no dedicated peat stockpiles being proposed.
1265	6.b	574		The Ore Transfer Building is said to have an impervious floor. The EAW should generally explain how the floor will be made so. Will the floor be underlain by a liner? If so, what polymer, what thickness, and how will panels be attached? Will a double composite liner be considered so that leaking monitoring can occur?	Answer questions; modify text as warranted.	Thank you for your question. The Ore Transfer Building will have a concrete slab floor and the Proposer would implement an inspection and maintenance program to ensure integrity during operations.
1266	6.b	588		The Draft Scoping Decision will likely require full assessment of the Decline Ramp, which will likely include any effects of crushing and rail loading on decline tunnel stability. The Draft Scoping Decision will also likely require a full analysis of the proposed air movement system, including indoor air quality in the Ore Transport Building and the air that enters the mine from the Portal through the Decline Ramp.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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1267	6.b	593		Talon proposes SEM tunneling. Talon should clarify that this method requires fully dry or effectively dewatered conditions and the proposed decline is in a wetland and saturated area (Figures 2 and 8). How long would this stage of construction take? What are consequences if dewatering fails? How much of the proposed construction area has artesian conditions?	Answer question; modify text as warranted.	Thank you for your question. The Portal and SEM Sections of the decline will be located in uplands, which helps to mitigate dewatering concerns. In addition, the draft EAW emphasizes the following points: "While the DSM and CB cells would limit inflows during construction, the designs for the Portal and SEM sections of the Decline Ramp incorporate long-term water mitigation (as the overburden within the CB cell would slowly saturate once the construction is complete and dewatering has ended). While the primary function of spiles (see section 6.5.2) is to provide structural support, it would also offer early shielding from groundwater inflows. As the SEM excavation advances, groundwater inflow would be minimized by applying a lining consisting of two passes of shotcrete to the back and ribs of the tunnel, separated by a 2-3 mm PVC waterproof membrane backed by a geotextile layer." The exact duration of the excavation of the Portal and SEM Sections of the decline is still being determined by engineers and will be shared as part of the EIS data submittal.
1268	6.b	600		Specify if one or a combination of drilling methods will be used once in bedrock.	Modify EAW to address comment.	Thank you for your question. As the EAW states in section 6.5.4, the Bedrock section of the Decline Ramp would be built using either drill-and-blast methods or mechanical excavation, such as a hard rock Mobile Tunnel Borer (MTB). Both methods will be evaluated while the proposer continues to advance engineering studies to determine which method(s) would be brought forward into the EIS.
1269	6.b	602	Graphic 6.4	If available, please supplement Graphics 6.4 with a more detailed graphic showing extents in plan view and cross sections. Also note that this level of detail would be expected for the Detailed Project Description provided at the start of EIS preparation.	Modify EAW to address comment.	Thank you for your comment. Graphic 6.4 is intended to illustrate the primary components of the decline ramp and their relationship to surface infrastructure. As noted, additional project details—including refined graphics will be provided as part of the Environmental Impact Statement (EIS) data submittal.
1270	6.b	612		Talon seems to be proposing to mix cement bentonite from the surface down to the level of the tunnel for as much as 295 feet in length in order to be able to dig the tunnel with an excavator. Is this due to the wet conditions of this site? Are there examples of other mines that have used DSM in this way?	Answer question.	Thank you for your comment. As described in Section 6.5 Decline Ramp of the EAW, the use of Deep Soil Mixing (DSM) and Cement Bentonite (CB) ground improvement techniques is proposed for tunneling through water-bearing and unconsolidated overburden. This approach addresses the engineering and geotechnical challenges presented by site conditions, particularly the saturated conditions in this area. DSM and CB methods are widely used in civil construction for ground stabilization, particularly in challenging soil and groundwater conditions. These techniques are not unique to mining and have been applied globally in support of tunneling, foundations, flood protection, and other infrastructure development. Their use here reflects best practices in geotechnical engineering for creating a safe and stable excavation environment.

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1271	6.b	623	**Graphic 6.5**	Nelsen 2022 citation not included in reference section.	Modify EAW to address comment.	Thank you for your comment. The reference to Nelsen 2022 was erroneous and has been deleted.
1272	6.b	632		A simple graphic similar to Graphic 6.5 would help readers conceptualize the CB section of the decline ramp. Please incorporate.	Modify EAW to address comment.	Thank you for your comment. As noted, additional project details—including refined graphics will be provided as part of the Environmental Impact Statement (EIS) data submittal.
1273	6.b	632		RGU notes that the Draft Scoping Decision will likely require characterization information on the likelihood of leaching or ARD of disturbed overburden materials.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1274	6.b	703	Graphic 6.6	Please use a better graphic to describe the CB cell. It is not clear what is the CB cell. Probably some additional labeling can assist, plus "dropping" the purple line and lower diagram to below the text box. Depicting the surface elevation is not clear.	Modify Figure to address comment.	Thank you for your comment. The graphic referenced and the description given does not appear to correspond with any graphic included in the Environmental Assessment Worksheet (EAW) as currently formatted.
1275	6.b	706		What evidence does Talon have that the bedrock below is competent for constructing the Cement Bentonite cells over it? Are there artesian conditions that could prevent this CB installation?	Answer questions; modify text as warranted.	Talon has conducted extensive geotechnical and hydrogeological programs to support the project's design. These programs have confirmed suitability of Cement Bentonite (CB) cells for the project. Due to the area's flat topography, there is very little or no vertical gradient that results in upward flowing water at the top of the bedrock that could prevent the CB installation.
1276	6.b	710		As clarification, would the water generated from dewatering of the SEM Section be eventually discharged to the same watershed as the WWTF discharge? RGU also notes the Draft Scoping Decision will likely require the predicted water quality from all types of water that will be released to the northern watershed, including discussion in the context of meeting water quality objectives.	Answer question.	Thank you for your comment. The Environmental Assessment Worksheet (EAW) states that "construction stormwater and construction water would be treated by and discharged through appropriate BMPs to the watershed near the northern boundary of the Project Area."
1277	6.b	711		Dewatering error in text. Would be from 1.4 to 3.6 million gallons.	Modify EAW to address comment.	Thank you for the comment. The units error has been corrected with the addition of "million".
1278	6.b	711		It is not clear if this dewatering discharge should be covered under the construction stormwater (CSW) permit or the Industrial stormwater permit. MPCA agrees that the EIS data submittal should provide an additional analysis regarding the level of treatment required for discharge of this dewatering water.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1279	6.b	712		Could the industrial stormwater pond hold the entire dewatering volume? If not, how does the projected pumping rate compare to the flow rates in the ditch where water would be discharged? Is there extra capacity for potential stormwater management during the expected pumping period? Please address.	Answer questions; modify text as warranted.	Thank you for the comment. Dewatering during construction would be addressed through the permitting process, based on site-specific planning and applicable requirements.

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1280	6.b	713		How was it determined that dewatering of overburden would not be considered contact water and could be released without treatment beyond settling of sediment? It would seem this would be a preliminary classification until chemistry of overburden and any waste rock, with associated water modeling of parameters in water that contacts the materials, available. RGU notes the Draft Scoping Decision will likely require full analysis of potential water quality of all dewatering during the SEM construction phase of the project.	Answer question; modify text as warranted.	Thank you for your comment. Contact water is defined as "Water that has directly contacted ore and/or waste rock." It also goes on to explain: "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."
1281	6.b	715		In the EIS, Talon should be expected to provide more specificity about the discharge point for dewatering.	Advisory. To be covered in EIS.	Thank you for your comment. This topic may be considered by the Responsible Governmental Unit (RGU) as part of the Environmental Impact Statement (EIS) process.
1282	6.b	717		Are there potential concerns with the water being “too clean”? Could excessively pure water disrupt the chemistry and adversely affect aquatic life?	Answer question; modify text as warranted.	Thank you for the comment. The potential for water to be “too clean” is noted. Discharge criteria are based on regulatory requirements intended to maintain appropriate water quality.
1283	6.b	722		Is Talon proposing to maintain a Cement Bentonite wall for dewatering while blasting large boulders and blasting to excavate the tunnel in the transition zone to bedrock? Are these two techniques consistent or would the dewatering fail in the presence of nearby blasting?	Answer questions; modify text as warranted.	Thank you for your question. The engineering team members have indicated that the Cement Bentonite walls will withstand blasting from construction of the Decline Ramp.
1284	6.b	734		RGU notes the Draft Scoping Decision will likely require the EIS to provide more specificity regarding overburden, consideration of peat material and implications for carbon release, and mercury release to the environment.	Advisory. To be covered in EIS.	Thank you for your comment. This topic may be considered by the Responsible Governmental Unit (RGU) as part of the Environmental Impact Statement (EIS) process.
1285	6.b	734		Technically the overburden is a mine waste. At a minimum, the overburden mine waste will need to be deemed "non-reactive", pursuant to nonferrous rules, if it is to be placed in a landfill. If the material is deemed reactive, it is unlikely a standard landfill can meet the nonferrous reactive mine waste rule requirements. Waste characterization of the material is necessary to determine whether or not it is deemed reactive.	Modify EAW to address comment.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1286	6.b	734		The specifications for the overburden material need also be presented as volume for consideration of capacity for storage options.	Modify EAW to address comment.	Thank you for your comment. The volume of overburden material that will excavated during construction will be incorporated into the Environmental Impact Statement (EIS) data submittal.
1287	6.b	734		Talon proposes overburden would be hauled to a landfill site. Is it known whether lined or unlined? In addition, how much of this overburden is peat? RGU notes that it is likely the Draft Scoping Decision assess what level of mercury is sequestered and could be released from this overburden.	Answer questions; modify text as warranted.	Thank you for your comment. The volume of overburden material that will excavated during construction will be incorporated into the Environmental Impact Statement (EIS) data submittal.

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1288	6.b	856		Please specify the rationale for the 2 mm (80 mil) PVC membrane? RGU notes the Draft Scoping Decision will likely require the Detailed Project Description to provide information on the durability and reliability of the polymer selected; how will the membrane panels be welded together and be tested; is there any redundancy in the liner system? Where appropriate detail can be added to the data submittal if available.	Answer question; modify text as warranted.	Thank you for your comment. The combination of a 2 mm (80 mil) PVC membrane and shotcrete is a common solution used within the Sequential Excavation Method (SEM) industry. Additional detail on the selected polymer liner will be provided as part of the EIS data submittal and/or the subsequent permitting process.
1289	6.b	857		Is the PVC membrane and geotextile layer intended to be permanent? Provide detail on where the membrane would be in the decline (bottom, sides, etc.) and how much inflow would remain.	Answer question; modify text as warranted.	Thank you for your question. Applying shotcrete to the PVC membrane would make it permanent. Although the design is being finalized, it is currently anticipated that the membrane would be applied to the Portal and SEM sections of the Decline Ramp.
1290	6.b	874		What are the potential effects on the wetland the railway spur is being built upon to the elevated ground proposed for the Ore Transfer Building. How will this impact the wetland hydrology on either side of the spur? What kind of peat compaction are expected under the spur?	Advisory. To be covered in EIS.	Thank you for your comment. This topic may be considered by the Responsible Governmental Unit (RGU) as part of the Environmental Impact Statement (EIS) process.
1291	6.b	876		Talon states some rock from the bedrock section of the Decline Ramp would be treated as ore and sent "to 'a' concentrator facility." Is this a different concentrator than the one planned in North Dakota? How much of the bedrock excavation would be waste rock?	Answer question.	Thank you for your question. The intended concentrator is facility Talon will construct in Mercer County, North Dakota.
1292	6.b	880		Minn. R. 6125 is for exploration and cannot be cited for authority regarding ore processing. Review Minn. R. 6132 for non-ferrous mining operations rules.	Modify EAW to address comment.	Thank you for your comment. Minn. R. 6125.0100 states "The purpose of parts 6125.0100 to 6125.0700 is to promote and regulate exploration for, mining, and removing ores that are primarily valuable for their metallic minerals content, and the rules hereunder shall be construed to carry out that purpose." Since this subsection explicitly includes mining, the proposer believes that the reference is appropriate.
1293	6.b	883		For ore, waste rock, and contact water, if available please provide preliminary estimates of the anticipated volumes and storage plans. RGU notes the Draft Scoping Decision will likely require assessment of the pollutants that would be present in contact water.	Modify EAW to address comment.	Thank you for your comment. The volume of overburden material that will excavated during construction will be incorporated into the Environmental Impact Statement (EIS) data submittal.
1294	6.b	883		RGU notes the Draft Scoping Decision will likely require the EIS to roughly specify the types of criteria behind the classification of the rock.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1295	6.b	894		It is understood that some drill-and-blast will be required due to limitations with the MTB. How does the extent and location of drill-and-blast potentially affect groundwater and the volume of waste rock?	Answer question.	Thank you for your question. The extent and location of drill-and-blast will not significantly affect groundwater or the volume of waste rock produced. Water from the underground workings will be processed in the Contact Water Treatment Plant prior to being discharged.

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1296	6.b	897		The Project focuses on use of a Mobile Tunnel Boring machine over a Tunnel Boring Machine; however examples of previous use are not that closely related to the proposed Project. Are there any other examples of MTB use in an underground mine with a similar climate?	Answer question; modify text as warranted.	Thank you for your question. The use of a Mobile Tunnel Borer (MTB) is not materially affected by surface climate, as the equipment operates underground where environmental conditions—such as temperature and humidity—are largely stable and controlled.
1297	6.b	918		In this case and others, when discussing space considerations and to the degree information is available, the submittal should include the volume of the unconsolidated earth materials (e.g., waste rock and ore) that in turn should include the void space. Regardless, this is information likely to be required in the Detailed Project Description provided in the EIS preparation stage of the process.	Modify EAW to address comment.	Thank you for the comment. The information requested—such as the volume of unconsolidated materials and associated void space—will be provided as part of the EIS data submittal.
1298	6.b	940		Where is the make-up water for both water circuits coming from?	Answer question.	Thank you for your question. As described in the draft Environmental Assessment Worksheet (EAW), "It is anticipated that non-potable treated water from the Contact Water Treatment Plant would be sufficient to meet these needs. However, an additional water supply well could be installed to supply mining activities if the volume of non-potable treated water is not sufficient to meet non-potable water demand."
1299	6.b	940		For the closed cooling water circuit, where will the cooling water go to dispose of the waste heat? (How is the cooling water cooled?)	Answer question.	The cooling water is pumped to the surface and is cooled through a surface mounted radiator type cooler before pumped back to the MTB.
1300	6.b	940		The Draft Scoping Decision will likely require water intrusion and total failure of this system to be analyzed in the EIS.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1301	6.b	942		Mobile Tunnel Borer (MTB) uses 19,800 gallons of water per day. Please indicate the source of this water and how much water is being re-used from the treatment plant	Answer question; modify text as warranted.	Thank you for your question. Please consult the response to comment 1298.
1302	6.b	952		The earth materials (overburden and rock?) removed for constructing the ventilation shafts will require waste characterization to determine if the materials are reactive and managed accordingly.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1303	6.b	954		The two vent raises are vertical shafts from the surface? What access equipment would be needed in them to allow them to serve as emergency egress routes, as described?	Answer question.	Thank you for the comment. One of the two vertical vent raises is planned to serve as an emergency egress route. As the EAW explains: "A ladderway, less than 300 ft (91.5 m) tall, would be constructed in Surface Raise #1 that would be collared East of the Ore Transfer Building."
1304	6.b	957		Talon proposes only two vent raises, #1 at 295 feet and #2 at 1,000 feet, to serve for both ventilation and for secondary emergency exits. However, at line 2020, the EAW says that surface raise #2 is "dedicated exhaust air, no personnel access."	Answer question; modify text as warranted.	Thank you for your comment. The referenced sentence has been revised to improve clarity. **Old** In addition to the decline ramp, two vent raises from the underground mine to the surface would be constructed for ventilation purposes and would also serve as a secondary

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						emergency egress routes. **New** In addition to the decline ramp, two vent raises from the underground mine to the surface would be constructed for ventilation purposes. Surface Raise #1 would also serve as a secondary emergency egress route. [R2_Cmt_#66] [R3_Cmt_#1304]
1305	6.b	957		Reading these sections together, is Talon proposing : 1) there will be only one secondary access at 295 feet depth, even though the mine will be 2,000 feet deep; 2) there will be ventilation only at 295 and 1,000 feet depth, although the mine will be 2,000 feet deep; 3) the "ventilation intake" through the portal will be within the building where ore will be crushed and loaded to rail and waste rock crushed for backfill? Explain access in terms of egress and ventilation considering presence of potential HAPs.	Answer question.	Thank you for your comment. For clarification of the Project's secondary egress design, please see the Proposer's response to comment 1304. The mine's ventilation flows will evolve throughout its mine life, and a detailed description of these changes can be found in section 6.12. The ventilation equipment for the Portal will be outside the Ore Transfer Building, as depicted Graphic 6.18.
1306	6.b	985		RGU notes that although the ore transfer will fully be enclosed, potentially reducing dust and potential contamination at the transfer location, the Draft Scoping Decision will likely require assessment of potential dust and contamination along the rail spur and the entire route to be examined.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1307	6.b	990		Is there a renewable energy source available that is consistent with the “Green Nickel” branding of the project?	Answer question.	Thank you for your comment. As noted in Section 18.b of the Environmental Assessment Worksheet (EAW), the Project is considering multiple strategies to reduce its greenhouse gas emissions, including “purchasing certified green electricity.”
1308	6.b	996		The text states "…strict controls would be maintained to ensure that activities are efficient and safe." Providing more details and/or examples of specific controls, especially those relating to safety controls, would be helpful. In the document this can be done by simply inserting: …ventilation intake, strict controls (e.g., XXX; YYY) would be maintained…	Consider comment, answer questions, and modify text as warranted.	Mine controls and safety procedures will be detailed during the operational readiness planning. These will include both physical and automated controls to maintain adequate ventilation, pumping, and equipment automation.
1309	6.b	997		Replace the term "artery" with something more appropriate for mining project.	Modify EAW to address comment.	Thank you for the comment. The term “artery” is used in the EAW as a descriptive and metaphorical term consistent with engineering and infrastructure terminology, where arterial routes denote primary conduits of flow or movement. In this context, it effectively conveys the role of the main underground decline as the central passage for personnel, equipment, and materials. The usage is supported by accompanying technical descriptors that clarify its intended meaning.
1310	6.b	1000		The earth materials (overburden and rock?) removed for constructing the secondary mine access/egress will require waste characterization to determine if the materials are reactive and managed accordingly.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1311	6.b	1002		The Draft Scoping Decision will likely require a detailed description of secondary mine egress and ventilation raise in the Detailed Project Description to be delivered EIS preparation.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1312	6.b	1011		"Miners would exit via the secondary mine egress network once it is deemed safe to proceed." How will it be deemed safe to proceed? How quickly will this determination be made?	Answer question.	Thank you for the comment. The statement, “Miners would exit via the secondary mine egress network once it is deemed safe to proceed,” is a general description of emergency egress protocol intended to convey that multiple underground escape routes would be available. Specific criteria and timing for determining when re-entry or evacuation via secondary egress is safe fall under detailed mine safety planning and regulatory compliance overseen by agencies such as the Mine Safety and Health Administration (MSHA).
1313	6.b	1018		EAW describes several methods of ore and waste rock extraction (drill and blast, drift and fill, long stoping, vertical development). The Draft Scoping Decision will likely require some explanation of when and where these would be used to determine any differential impacts.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1314	6.b	1030		What activities—diesel fleet maintenance, fueling, etc. are proposed to take place within the mine? At what level(s)?	Answer question.	Thank you for your comment. Please consult Section 6.21.12 for a description of the Underground Maintenance Area and Storage.
1315	6.b	1034		The data submittal at this text uses the general term "bedrock" to label non-economically viable material disturbed by mining. RGU notes that the precise terminology is "ore" and "waste rock," and in this instance the "bedrock" being discussed is indeed waste rock to be shipped to the concentrator and/or used as backfill feed. The Draft Scoping Decision will likely require use of the precise terminology, include specification of the volume of waste rock that will be generated by tunnel infrastructure development, and detail how waste rock would be used as backfill while the mine is still being developed and mined. It is also possible that contingencies be explored in case shipping ore/waste rock to the primary concentrator proves infeasible for periods of time; this will be determined during development of the Draft Scoping Decision.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1316	6.b	1038		Water quality from these sources must be characterized in EIS	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1317	6.b	1039		Describes pumping not only of groundwater inflows, but that "mining equipment, water sprays, and underground services would be pumped from the underground mine." RGU notes the water chemical balance will need to account for all potential contaminants, including the identified activities.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1318	6.b	1058		Suggests that drift and fill mining would be used for the CGO East and West ore bodies and the MSU ore body because ore thickness is 6-30 feet on an average downward angle of 23 degrees. What is the volume of these ore bodies? What is the feasibility of conforming excavations to ore geometry to minimize dilution?	Answer questions; modify text as warranted.	Thank you for your question. Drift and Fill mining is planned for the flat or dipping sections of the CGO because it is recognized as an "expensive but selective mining method, with low ore loss and dilution. dilution." https://statics.teams.cdn.office.net/evergreen-assets/safelinks/1/atp-safelinks.html. Engineering and mine planning for these areas is ongoing, and the relevant volume information will be finalized and presented as part of the EIS data submittal.
1319	6.b	1101		Which, if any of these functions would be automated: drilling, loading, blasting, mucking, scaling, bolting?	Answer question.	Thank you for the comment. Talon is not currently proposing the use of automation for the Project. While certain aspects of the mine development cycle can technically be automated, decisions regarding such technologies would be evaluated during future operational readiness planning. Because no specific automation is planned at this stage, it is not expected to influence the scope of environmental effects assessed in the EAW. If automation is considered in the future, potential environmental implications would be evaluated through the appropriate permitting or review processes.
1320	6.b	1117		Will the filtration or scrubbing process treat CO and Nox?	Answer question.	Thank you for your question. Talon is committed to exploring practical and effective emission controls—both at point sources such as vehicles and within the mine's ventilation system. As part of the EAW's Alternatives process, a range of emission control concepts have been identified for consideration. Overall, emissions of criteria pollutants such as CO and NO_x are expected to be limited and consistent with regulatory thresholds; the potential mitigations being considered in the alternatives analysis are being reviewed for feasibility and relevance and may inform refinements to the Project's design.
1321	6.b	1142		If known, please provide more information regarding the sourcing of aggregate. Will aggregate be sourced from one or multiple sites and where will it be sourced from? Additionally, impacts of hauling aggregate to the stie should be included. RGU notes Draft Scoping Decision will identify the level of detail and types of assessment required for aggregate material sourcing.	Answer question; modify text as warranted.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1322	6.b	1142		To the degree now known, explain the rationale for determining which areas of drift-and- fill mining would require backfill. Within what time frame would backfill be prepared from waste rock and aggregate and backfill pushed into the stope? What size is Talon proposing would be used for uncemented backfill?	Answer questions; modify text as warranted.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1323	6.b	1143		Further details needed on where aggregate will be stockpiled on site for the surface mixing at batch plant.	Answer question; modify text as warranted.	Thank you for your question. The Draft Environmental Assessment Worksheet (EAW) explains that externally sourced aggregate "would have its own buffer outside the Ore Transfer Building, and would be conveyed into the building as required."

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1324	6.b	1149		SMSU used without defining it until Line 2061, and then relationship is not shown until Graphic 11.1. Define SMSU upon first use.	Modify EAW to address comment.	Thank you for your comment. The referenced sentence has been revised to improve clarity. EDIT Old Bulk mining would be used in the SMSU and 138 Ore Bodies, where the ore body geometry is more massive and vertically oriented. Modified Bulk mining would be primarily used in the semi-massive sulfide unit (SMSU) and 138 Ore Bodies, where the ore body geometry is more massive and vertically oriented. [R3_Cmt_#1324]
1325	6.b	1149		138 ore body/zone is used without defining it. Please define and add to Graphic 11.1.	Modify EAW to address comment.	Thank you for the comment. The text and graphic have been updated. **EDIT** **Original** The different intrusions include FGO (fine grained orthocumulate), CGO (coarse grained orthocumulate), and MZNO (mixed zone). **Modified** 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 138 zone is net textured sulfide mineralization in the FGO. [R3_Cmt_#1325]
1326	6.b	1149		Analysis should be completed on any imported backfill to ensure that it is not acid generating and will not leach. Further, it should be tested to ensure that it does not contain invasive plant species.	Consider comment; modify EAW as warranted.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1327	6.b	1149		To the degree currently known, what volume and percent of ore could be mined with bulk mining methods in the SMSU and 138 Ore Bodies? What grade of ore and waste rock would be bulk mined? The Draft Scoping Decision will likely require the Detailed Project Description to provide reasonable estimates for this activity for EIS preparation.	Answer questions; modify text as warranted.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1328	6.b	1191		RGU notes that Draft Scoping Decision will likely require detailed description of engineered emission control device(s) for the Detailed Project Description. Issue also addressed at Item 17.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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1329	6.b	1207		To the degree known, would all stopes be backfilled with waste rock aggregate and/or sourced aggregate with a binder? …What are estimates of quantities needed? RGU notes the Draft Scoping Decision will likely require material characterization of sulfate, metals, etc. in waste rock and possibly aggregate.	Answer questions; modify text as warranted.	Thank you for your comment. As section 6.11 of the EAW explains: "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] The fill requirements would be further evaluated and detail provided in the EIS data submittal. [R2_Cmt_#159] [R2_Cmt_#16] [R2_Cmt_#1008] [R2_Cmt_#1010] A preliminary and conservative estimate projects that approximately 3.9 million tons (3.5 million tonnes) of backfill would be required. Of this, approximately 1.3 million tons (1.2 million tonnes) would be supplied by waste rock, which would account for approximately 1/3 of the requirements. Externally sourced aggregate would be required starting in the third year of production as the mine development begins to taper off once the decline ramp is completed. [R2_Cmt_#164]"
1330	6.b	1207		RGU notes the Draft Scoping Decision will likely need to specify how aggregate supply to be assessed. Factors could include: general demand for aggregate for backfill; likely distribution of additional mining (if any); context in terms of regional aggregate supply; overall availability of aggregate resources to satisfy project and other aggregate needs.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1331	6.b	1208		Is the shotcrete proposed to reduce groundwater flow and seepage through the backfill in the mine? Would stopes be grouted, lined with bentonite or other materials to prevent groundwater contamination?	Answer questions; modify text as warranted.	Thank you for the question. Talon does not propose to line or shotcrete the stopes that will be backfilled.
1332	6.b	1211		Within what timeframe after a stope was mined out would backfill be produced and placed into the stope? How much of the 50 ft x100 ft x100 ft stope area would be filled with waste rock/aggregate? Would rock be retained or other supports constructed?	Answer questions; modify text as warranted.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1333	6.b	1215		Section 6.10. - Please, generally describe actions to be taken if unanticipated fractured bedrock is encountered and/or unanticipated groundwater is encountered during boring operations	Answer question.	Thank you for the comment. In a Conventional Raise Bore, unanticipated groundwater encountered will drain to the underground shaft below, and pumped to holding reservoirs for treatment at a later stage. In a Blind Bore, water would be pumped to surface as part of the drilling process, and treated in the Contact Water Treatment Building.
1334	6.b	1231		Confirm mine will have two bored raises (Surface raise #1 and #2) originating from surface.	Answer question.	Thank you for the inquiry. As stated in the EAW, "Tamarack would have two bored raises that would originate from surface, Surface Raise #1, which

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						would be developed conventionally, while Surface Raise #2 would be driven “blind” (i.e., top down)."
1335	6.b	1234		During construction of vertical developments using conventional raise bore and blind bore, the project should clearly state how water used/encountered in these processes will be handled (e.g. industrial water vs contact water vs construction water etc.)	Answer question.	Thank you for the comment. In a Conventional Raise Bore, unanticipated groundwater encountered will drain to the underground shaft below, and pumped to holding reservoirs for treatment at a later stage. In a Blind Bore, water would be pumped to surface as part of the drilling process, and treated in the Contact Water Treatment Building.
1336	6.b	1242		Raises would be vertical and between 4-20 feet in diameter (potentially 1000 feet long). Would the raises be reinforced? How?	Answer questions; modify text as warranted.	Thank you for the question. Final decisions regarding whether and how raises would be reinforced will be determined during detailed engineering and design, which will include geotechnical evaluations. Overburden sections of raises are expected to require support, while bedrock only raises or bedrock sections of raises would be assessed individually based on site-specific conditions.
1337	6.b	1244	Graphic 6.11	Please, describe what material/method would be used to seal the boring from groundwater	Answer question.	Thank you for the question. Final decisions regarding whether and how raises would be sealed from groundwater will be determined during detailed engineering and design.
1338	6.b	1253		Will fines from reverse circulation also be shipped to the North Dakota site? How will the water of this process be handled? Is there a place on the mine property to decant if necessary?	Answer questions; modify text as warranted.	Thank you for your question. Fines from reverse circulation will also be shipped to the North Dakota site. The water management and decanting processes will be similar to those described in section 6.19.1. Further details will be provided in the EIS data submittal and permitting processes.
1339	6.b	1261		To the degree that is known, provide a general comparison between the projected volume of waste materials and CRF produced versus available space in the underground, as well as the expected strip ratio between ore and waste rock. Regarding the proposed disposal of waste rock in the underground mine works as cemented rockfill (CRF), the Draft Scoping Decision will likely require detail and quantify the volume of CRF that will be produced, and if there is adequate space in the underground workings to accommodate it in order to assess the potential risk of excess materials underground.	Answer question.	Thank you for the comment. Based on current estimates, the projected volume of waste materials and CRF is expected to be less than the available space within the underground mine workings. Detailed volume estimates and space utilization will be provided as part of the Environmental Impact Statement (EIS) data submittal or the Permit to Mine application.
1340	6.b	1263		Bedrock from development would be ore or waste rock and waste rock would be used for underground backfill. How would Talon determine what is waste rock and what is ore? Where would waste rock be crushed and mixed with a binder for backfill? Where would waste rock be stored before used for backfill?	Answer questions; modify text as warranted.	Thank you for the comment. As the EAW describes: "the criteria for whether this material would be ore or waste rock would be provided in the EIS data submittal." Waste rock identified for use as cemented rockfill (CRF) would be transported to the Ore Transfer Building, where it would be crushed to the appropriate size and mixed with binder materials for backfill. Waste rock intended for backfill would be buffered within a designated area of the Ore Transfer Building.
1341	6.b	1264		Has a lab been identified to measure hardness of CRF during the backfill process? There are strict quality assurance requirements with CRF and it is recommended to secure a lab sooner rather than later.	Answer question.	Thank you for the comment. Talon appreciates the observation regarding quality assurance considerations for cemented rockfill (CRF) and will continue to evaluate operational planning needs as the Project progresses.

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1342	6.b	1265		EAW says excavation "could" be backfilled using Cemented Rockfill (CRF) produced in a plant in the Ore Transfer Building. No clear plan for 1) what fill would be used for backfill (crushed waste, aggregate, CRF), 2) where it would be crushed/produced, 3) what quantity, 4) when backfilling would take place (during or after mining).	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1343	6.b	1270		CRF recipe: "binder, such as cement, crushed rock/gravel and add-mixtures needed to help set the concrete." Need to explain if this is waste rock and how crushed rock could be considered a "binder."	Answer question.	Thank you for the comment. The sentence has been edited. **EDIT** **Old** "binder, such as cement, crushed rock/gravel and add-mixtures needed to help set the concrete." **Modified** "binder (e.g., cement), waste rock / externally sourced aggregate and add-mixtures needed to help set the concrete." [R3_Cmt_#1343]
1344	6.b	1279		Please clarify if any tailings could be stored on-site and used as backfill after mine operations.	Modify EAW to address comment.	Thank you for the comment. As described in the EAW, no tailings would be stored on-site or used as backfill during mine operations.
1345	6.b	1282		RGU notes that a likely EIS issue will be the need to evaluate potential reactivity of CRF, and potential for dissolution of sulfate & chloride to groundwater and connected surface waters/wetlands. This would likely be presented in the Draft Scoping Decision.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1346	6.b	1283		Commenter notes water used for CRF from the Contact Water Treatment Plant could have sulfate content up to 2,000 mg/L and chloride levels up to 4,500 mg/L, with a pH just above 4. What impacts do Talon anticipate on groundwater flowing through the CRF? What is the expected relative efficacy of the treatments mentioned in the document, including: membrane filtration; ion exchange; precipitation; nano-filtration; carbon filtration; biological treatment, that could treat highly saline and acidic water? Treated discharges would be expected to comply with all applicable numeric and narrative standards?	Answer question.	Thank you for the comment. Talon acknowledges the importance of water quality in the production of cemented rockfill (CRF). As described in the EAW, the Project would use water appropriate for CRF production. The water quality values presented reflect minimum requirements of the cement. Final water quality specifications for CRF production will be developed as part of the Environmental Impact Statement (EIS) process and during final design and permitting to ensure compliance with all applicable regulatory standards.
1347	6.b	1284		Is there research or data to confirm that the water quality for CRF production could attain the listed specifications: "no organic material, a pH greater than 4, sulfate content below 2,000 mg/L, and chloride levels below 4,500 mg/L."	Answer question.	Thank you for the comment. Talon acknowledges the importance of water quality in the production of cemented rockfill (CRF). As described in the EAW, the Project would use water appropriate for CRF production. The water quality values presented reflect minimum requirements of the cement. Final water quality specifications for CRF production will be developed as part of the Environmental Impact Statement (EIS) process and during final design and permitting to ensure compliance with all applicable regulatory standards.
1348	6.b	1285		Cite where these water quality requirements were derived, specifically pH>4 and SO4<2,000 mg/L.	Answer question.	The correct reference to the maximum sulfur content in water used in the mixing of concrete should read:" The maximum

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						Sulfate content of the water should be < 2,000 mg/L" The data was sourced from an online article: "Water quality in the concrete mix", written by John Roxburgh, senior lecturer at Cement and Concrete SA, and published in the magazine for the Institute for Municipal Engineers for Southern Africa, May 2021. The recommended pH value for water used in the mixing of concrete is stated in the same article. https://issuu.com/glen.t/docs/imiesa_may_2021/s/12411063
1349	6.b	1287		Is it a demonstrated industry practice to use CRF with 4-10% binder materials (see line 982) for structural support and to mine and backfill?	Answer question.	Thank you for the comment. It is a demonstrated industry practice to use cemented rockfill (CRF) with 4–10% binder content to achieve the strength necessary for structural support and continued mining operations.
1350	6.b	1295		The document indicates the plan is for mining at 300 ft below the surface, with a "crown pillar" of @ 200 ft of bedrock. As it is now known, what is the geology of bedrock at the location of the crown pillar (see e.g., Lines 2033-2064), including the type of rock as well as rock quality? RGU notes that the Draft Scoping Decision will likely require detailed analysis of crown pillar stability and potential subsidence.	Answer question.	Thank you for the comment. The crown pillar area is dominantly composed of FGO. The rock quality in this area will be discussed in the EIS.
1351	6.b	1298		Commenter notes text stating "Numerical and empirical analysis... indicates crown pillar deflection would be negligible...." What does this mean? RGU notes that the Draft Scoping Decision will likely require detailed analysis of crown pillar stability and potential subsidence, with possible assessment of any temporal aspect, including how much deflection over how many years: life of the project? 50 years? 100 years? 500 years?	Answer question.	Thank you for the comment. As described in the EAW, "Numerical and empirical analysis of these planned excavations indicates crown pillar deflection would be negligible...", with preliminary modeling showing less than 0.2 inch of surface deflection. Additional subsidence analysis, including assessments of potential long-term deflection over the life of the project and beyond, will be incorporated into the Environmental Impact Statement (EIS) data submittal. This topic will also be addressed during development of the Draft Scoping Decision Document (DSDD).
1352	6.b	1310		What type of modeling is being referred to in this sentence?	Answer question.	This is referring to geotechnical modeling that has been completed to confirm the structural integrity of surrounding rock that would be required to support the redistribution of stresses caused by the excavations (voids) left behind as the rock as it is mined. To date, Talon has completed empirical static load modeling to understand the likelihood for failure based on the planned excavations. As cited, this modeling suggests that the CGO E/W are very competent and do not require a comprehensive support program. Future study will include comprehensive numerical modeling that considers a wider range of criteria, including mine sequencing, timing, excavation size, etc.
1353	6.b	1310		The submittal indicates there may be situations where mined out areas have sufficient structural integrity that backfill would not always be required. RGU notes the Draft Scoping Decision will likely require detailed analysis on this aspect of the mine plan with the base information provided in the Detailed Project Design or special studies prepared for the EIS.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

Comment No.	EAW Item No.	EAW v3 Line 1	Table, Figure, Graphic	Round 3 RGU Comment to Talon 04/10/2025	Requested Action by RGU	Talon Response and Treatment in EAW 06/23/2025
1354	6.b	1310		CGO East and West are not defined upon first use. Please define at the first use in the document, line 1057.	Modify EAW to address comment.	Thank you for the comment. Talon will update the text to define CGO East and CGO West upon first use.
1355	6.b	1310		Backfill of mine workings is critical for stability of the underground mine post closure and leaving portions of CGO East and West zones without consistent backfill could change the hydrology of the area. Mine induced subsidence of an inch or two has the potential to alter water flows at the surface which would impact hydrology in the wetlands that are located above the mine workings. Backfill is also important in reducing the flow of contact groundwater from the mine workings during closure and post closure. Please provide more detail to support this approach, including the basis of determining the structural integrity of these zones.	Provide data as requested.	There was no comment provided for 1355.
1356	6.b	1317		Commenter notes that the EAW gives preliminary estimate that "approximately 3.9 million tons (3.5 million tonnes) of backfill would be required. Of this, approximately 1.3 million tons (1.2 million tonnes) would be supplied by waste rock, which would account for approximately 1/3 of the requirements." RGU notes Draft Scoping Decision will likely require detailed information disclosing the amount and source of backfill materials, timing of when backfill would be needed for structural integrity, and generally in what locations. Scoping document will also likely require some disclosure what conditions in the rock could create particular structural integrity concerns.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1357	6.b	1318		To the degree known, has a sufficient local external source of aggregate fill been identified and which transportation routes would be used to move aggregate to the site?	Answer question.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1358	6.b	1318		Further consideration is needed in the landfilling of both overburden and initial waste rock. It is estimated that 1/3 of the needed backfill, will be provided by waste rock (once mine developed). Both overburden and initial waste rock could be stockpiled and reused on or in the vicinity of the site.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1359	6.b	1319		The Draft Scoping Decision will likely include assessment of the chemical behavior of the externally sourced aggregate; this could be needed if its behavior by exposure to water may be different from the rock removed from the excavation of the decline ramp.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1360	6.b	1323		The document states ventilation will be "through the Portal (Decline Ramp), Surface Raise #1, and Surface Raise #2, all of which would connect to the atmosphere at the surface." Since the Portal opens into a Building where waste rock will be crushed, with loading for backfill plus ore loading to railcars, how is this "fresh air intake" for ventilation to be achieved?	Answer question.	Thank you for your question. The ventilation equipment for the Portal will be outside the Ore Transfer Building, as depicted Graphic 6.18.

Comment No.	EAW Item No.	EAW v3 Line 1	Table, Figure, Graphic	Round 3 RGU Comment to Talon 04/10/2025	Requested Action by RGU	Talon Response and Treatment in EAW 06/23/2025
1361	6.b	1328		How is egress for workers for Surface Raise #1 achieved? Ladder? Stairs? Raise #2 at 1,000 feet is "dedicated exhaust air, no personnel; access." Does Talon really propose no emergency egress for more than 1700 feet depth of mine?	Answer question.	Thank you for the comment. As described in the submittal, Surface Raise #1 would be equipped with a fresh air intake fan and would serve as a fresh air raise during operations. Surface Raise #1 would also be equipped with a fixed ladderway for emergency egress from underground. Surface Raise #2 would function solely as an exhaust ventilation raise and would not be equipped for personnel access or egress. In addition to the ladderway in Surface Raise #1, the portal would provide a secondary egress route. Together, the ladderway in Surface Raise #1 and the portal ensure that multiple means of emergency egress are available for underground personnel in accordance with standard mine safety practices.
1362	6.b	1331		If known, what is the estimated energy demand to heat the intake air? RGU notes this information likely required as part of GHG analysis in the Draft Scoping Decision.	Answer question.	Thank you for the comment. Talon recognizes that estimating the energy demand associated with heating intake air will be an important consideration for greenhouse gas (GHG) analysis. The energy demand for air heating is influenced by factors including the total intake airflow volume, seasonal ambient temperatures, and the desired intake air temperature to support safe underground operations. GHG information will be provided as part of the EIS data submittal.
1363	6.b	1333		Please clarify that the scrubber for the main exhaust is a wet scrubber for consistency throughout the EAW. If known, what will the reduction of control be? Will this system remove particulates and toxics for workers in the mine and the Ore Transfer building as well, or will additional controls be necessary?	Answer question.	Thank you for the comment. The main exhaust system for the underground mine would utilize a wet scrubber, consistent with the descriptions provided throughout the submittal. In addition to the wet scrubber, other control measures would be employed to further minimize particulate emissions. The wet scrubber would contribute to the removal of particulates from the mine exhaust air. Information regarding the expected control efficiency of the wet scrubber to be provided as part of the EIS data submittal or the permitting process.
1364	6.b	1351	Graphic 6.13 and 6.14	Most of the "free flow" of "fresh air" is illustrated as snaking down the main tunnel that opens into the Ore Transfer Building. What is the length of the tunnel? What other activities, diesel trucks, blasting, crushing, mucking would affect the "fresh air" inhaled within the mine?	Answer question.	Thank you for the comment. The main tunnel, or decline ramp, would extend approximately 15,000 feet from the surface portal to the active underground mining areas. During operations, fresh air would be supplied through the portal and Surface Raise #1 and directed into the underground workings via the primary ventilation system, supplemented by booster fans and ducting. The mine's ventilation system is designed to manage these sources of dust and emissions by providing sufficient airflow to dilute and remove exhaust gases, dust, and fumes, maintaining air quality that meets or exceeds regulatory standards for worker safety.
1365	6.b	1362		Please define MSHA as Mine Safety and Health Administration at this first use in the EAW, and include it in the List of Abbreviations and Acronyms.	Modify EAW to address comment.	Thank you for the comment. Talon will update the Environmental Assessment Worksheet (EAW) to define MSHA as the Mine Safety and Health Administration upon first use and will include it in the List of Abbreviations and Acronyms. [R3_Cmt_#1365]

Comment No.	EAW Item No.	EAW v3 Line 1	Table, Figure, Graphic	Round 3 RGU Comment to Talon 04/10/2025	Requested Action by RGU	Talon Response and Treatment in EAW 06/23/2025
1366	6.b	1369		If known, what quantities of diesel and explosives would be stored in the underground mine? RGU notes the Draft Scoping Decision will likely require estimates of diesel and explosives use and storage to be available for the EIS.	Answer question.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1367	6.b	1382		GHG emissions estimates should clearly identify using diesel fleet vehicles.	Consider comment; modify EAW as warranted.	Thank you for the comment. The Environmental Assessment Worksheet (EAW) notes that "a diesel equipment fleet has been assumed as the basis for both mine development and operations."
1368	6.b	1401		Does the phrase "all vehicles" hear mean all of the above listed vehicles or is it more expansive to any vehicles (employee vehicles, gondola railcars, etc.)?	Answer question; modify text as warranted.	Thank you for the comment. The Environmental Assessment Worksheet (EAW) section discussing "all vehicles" refers specifically to the diesel-powered mobile equipment identified in the fleet listing, including haul trucks, LHD vehicles, drills, and other underground and surface support vehicles. The phrase is not intended to include employee vehicles, gondola railcars, or similar conveyances not listed as part of the operating fleet.
1369	6.b	1414		Typo: "rate of approximately 3,300 tons (3,000 tonnes) day" should state "per" day.	Modify EAW to address comment.	Thank you for the correction. The text of the EAW was modified accordingly. **EDIT** **Original** "rate of approximately 3,300 tons (3,000 tonnes) day" **Modified** "rate of approximately 3,300 tons (3,000 tonnes) per day"
1370	6.b	1414		Production at steady state is expected to be 3,300 tons of ore per day or 1.2 million tons per year. If known, how much waste rock is expected to be produced per day? Per year?	Answer questions; modify text as warranted.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1371	6.b	1415		Use of battery electric vehicles (BEVs) and on-site renewable energy should be evaluated as an alternative to the diesel equipment fleet. Alternatives and EIS should evaluate GHG impacts, as well as health impacts of using diesel engines vs BEVs.	Advisory. To be considered during alternatives process.	Thank you for your comment. This topic may be reviewed during the development of alternatives as part of the Environmental Impact Statement (EIS) process, if determined relevant by the Responsible Governmental Unit (RGU).
1372	6.b	1423		How long will it take produce 4,400 tons of waste rock for the CRF? Based on the estimated amount of fill needed the buffer would last approximately 3 to 4 days and account for less than half of the needed aggregate. Has Talon found a nearby gravel pit that is capable of providing the extra aggregate that will be needed for the life of the project?	Answer question; modify text as warranted.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

Comment No.	EAW Item No.	EAW v3 Line 1	Table, Figure, Graphic	Round 3 RGU Comment to Talon 04/10/2025	Requested Action by RGU	Talon Response and Treatment in EAW 06/23/2025
1373	6.b	1423		Please provide more detail in how ore and waste rock would be stored in the Ore Transfer building. In the event of the railcars and the storage area in the Building are full, is there a plan for how Talon would manage?	Consider comment, answer questions, and modify text as warranted.	Thank you for your question. Design of the Ore Transfer Facility is ongoing. The current design for the ore and waste rock buffer areas envisions predetermined spaces on the building's concrete slab floor, which would be constructed to support the anticipated maximum material loads. In the rare event that both the building's storage capacity and the railcars are fully utilized—such as during a rail delay—Talon would manage material flows using standard operational strategies, including temporarily staging mined material in open stopes. Additional detail regarding material handling and contingency strategies would be provided as part of the EIS data submittal and/or the permitting process.
1374	6.b	1430		Explain what the term "buffer" means as used in "ore buffer area" and "waste rock buffer."	Modify EAW to address comment.	In the context of the Tamarack Mining Project, the term "buffer" refers to a designated area used to temporarily hold and manage material, such as ore, prior to its transport off-site or its further handling. These buffer areas are not intended for long-term storage; rather, they provide operational flexibility to accommodate the timing of underground production, surface logistics, and scheduled rail transport. Buffers help ensure continuous operations during routine handling or temporary disruptions (e.g., railcar availability or loading schedules).
1375	6.b	1451		Would this material be considered the underground slimes? If not, that should be included in a 5th bullet.	Answer question; modify text as warranted.	Thank you for the comment. The EAW identifies the materials that would be managed during the Project, including fines collected from underground settling sumps. Talon believes the current description appropriately captures the materials anticipated to be handled, and no additional bullet is proposed.
1376	6.b	1452		How exactly would the waste rock be mixed with cement for backfill?	Answer question.	Thank you for the comment. As described in the EAW, "The waste rock or externally sourced aggregate would be fed into a crusher to produce the smaller particles needed to produce the CRF mix. The crushing facility would be located in an enclosed building with dust-control systems. This crushed material, or externally sourced aggregate, would then be fed into a mixer where it would be blended with cement and water to make CRF. The blended CRF would be placed into the bed of a haul truck for return underground."
1377	6.b	1455		If known, indicate if a secondary source of backfill material has been identified. If so, then indicate where it is and how production and haulage would be handled.	Answer question.	Thank you for your question. Several potential local aggregate producers have been identified by the proposer's team, which will be evaluated as the engineering progresses. Concerning haulage, the EAW currently states that "The backfill aggregate buffer would be sized to supply the backfill batch plant when waste rock production quantities are insufficient. A truck unloader facility would be provided at the backfill aggregate buffer to facilitate rapid unloading of trucks hauling backfill aggregate to the mine site. The aggregate would be offloaded, piled and conveyed into the Ore Transfer Building for use in the Backfill Plant."

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1378	6.b	1459		RGU notes that mine materials characterization program is currently preliminary, is a work in progress, and could be expanded. Not all required testing has begun and there are mine wastes (e.g., underground mine slimes) that still await approved workplans and starts. Preliminary reports of work completed to date have not been submitted and are outstanding. RGU further notes it is likely the Draft Scoping Decision will mirror Permit to Mine waste characterization information requirements to support both the EIS and permitting analyses, including static, kinetic, and mineralogical analyses and other work.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1379	6.b	1472	Graphic 6.15	How many tons and what percentage of total waste rock does Talon propose to use as backfill without binding or CRF production?	Answer question; modify text as warranted.	Thank you for the comment. Estimates of the tons and percentage of total waste rock proposed for use as backfill without binding will be developed as part of the Environmental Impact Statement (EIS) data submittal and the permitting process. These values will reflect mine planning, material balance, and geotechnical considerations specific to the final design.
1380	6.b	1475		If known, further details are needed on what landfill facility would accept overburden and waste rock generated during initial mine development, and landfill compliance/requirements.	Answer question.	Thank you for the comment. A landfill facility to accept overburden has not yet been finalized. Overburden would be managed in compliance with applicable federal, state, and local regulations. Additional detail regarding disposal locations and permitting requirements will be provided, if applicable, as part of the Environmental Impact Statement (EIS) process or permitting.
1381	6.b	1475		Commenter questions how disposal of overburden as proposed could impact site reclamation? What happens when mine closeout happens and the surface needs to be restored?	Answer question.	The project design does not include onsite storage of overburden. As a result, site reclamation and final grading would rely on remaining onsite material or other planned fill sources.
1382	6.b	1483		RGU notes that Draft Scoping Decision will likely require estimates of ore and waste rock generation during the Decline Tunnel's construction to support analysis of potential rail transport impacts.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1383	6.b	1547		RGU notes the Draft Scoping Decision will likely need to specify how aggregate supply to be assessed. Factors could include: general demand for aggregate for backfill; likely distribution of additional mining (if any); context in terms of regional aggregate supply; overall availability of aggregate resources to satisfy project and other aggregate needs.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1384	6.b	1547		Does this text mean that the 4-inch waste rock pieces would be crushed to smaller particles and fed into a mixer to make CRF? Is there a second "enclosed building" within the Ore Transfer Building where the CRF crushing facility would be located or does this phrase refer to the Ore Transfer Building as a whole?	Answer question.	Thank you for the comment. Waste rock would be hauled to the Ore Transfer Building and crushed to less than 4 inches in size before being fed into the backfill batch plant located within the same building. The phrase "enclosed building" refers to the Ore Transfer Building as a whole, which would house both the crushing equipment and the CRF batch plant in separate areas within the enclosed structure.

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1385	6.b	1559		If known, what is the planned capacity of the crusher and what controls would be implemented to capture dusts (including HAPs) for internal and external air quality?	Answer question.	The planned material handling system is still under refinement; however, current design concepts include enclosed crushing operations with air handling systems to minimize emissions. The crushing unit would be housed indoors, with ventilation systems designed to maintain negative pressure and capture particulate matter, including if present hazardous air pollutants (HAPs), using filtration technologies. Final crusher capacities and associated air quality control measures would be evaluated in more detail during the Environmental Impact Statement (EIS) process and addressed in applicable air permitting documentation.
1386	6.b	1568		What "facility" for rail loading of ore would "include exhaust air scrubbers or fabric filters to control dust emissions"? Is this the Ore Transfer Building as a whole? Dry or wet scrubbers? What indoor air quality control is proposed?	Answer question; modify text as warranted.	Thank you for the comment. Please see section 6.21.6 Dust Control System that provides these details.
1387	6.b	1599		Commenter questions whether there is a category of water capture from underground drilling that does not contact mine workings? If yes, this could utilize a "clean water" line that would plumb directly into a cased drill hole. If demonstrably uncontaminated this water could be used for de-watering wet areas of the mine and to supply additional non-potable water underground.	Answer question.	Thank you for the comment. All water originating from the underground mine would be managed as contact water, consistent with the definition provided in Section 6.19 of the EAW.
1388	6.b	1600	Figure 5	Is the runoff from the railroad load out area and the temporary storage areas outside the transfer building considered contact water? Where is runoff generated from this part of the site directed? Is it subject to any type of treatment?	Answer question.	Thank you for the comment. As defined in Section 6.19 of the EAW, contact water includes water collected from within the Ore Transfer Building and the underground mine, which would be treated at the Contact Water Treatment Plant. Runoff from areas outside the Ore Transfer Building, including the rail loadout and temporary storage areas, is managed as industrial stormwater and is not classified as contact water. Surface flow directions for these areas are illustrated in Figure 5. Water management in these locations will follow applicable industrial stormwater regulations and will be further detailed in the EIS data submittal and/or during permitting.
1389	6.b	1600	Graphic 6.16	Is the "Industrial Stormwater Management System" in the flow-chart just a pond? If not, please clarify in text.	Answer question; modify text as warranted.	Thank you for the comment. As described in the EAW, the Industrial Stormwater Management System consists of multiple components, including surface swales, stormwater collection ponds (wet sedimentation basins), and underground piping where appropriate. The system is designed to manage industrial stormwater runoff in accordance with applicable NPDES/SDS permitting requirements.

Comment No.	EAW Item No.	EAW v3 Line 1	Table, Figure, Graphic	Round 3 RGU Comment to Talon 04/10/2025	Requested Action by RGU	Talon Response and Treatment in EAW 06/23/2025
1390	6.b	1602	Graphic 6.16	The proposed water treatment technology for contact water is reverse osmosis (RO). An RO plant will separate contact water into 1) a clean stream with low concentrations and 2) a concentrated brine. The document should recognize the need for appropriate brine management. For example, the EAW could mention the use of additional brine treatment to ensure safe disposal of a solid product (and blending of the treated brine stream with the clean stream). Graphic 6.16 indicates the use of the brine stream in CRF production and as source for dust control/ underground drilling. However, this may not be feasible. Please, add to the text the need for assessment of the risk of generating a brine product using RO technology. Please include a brief discussion of brine and/or byproduct waste management from water treatment processes.	Answer question; modify text as warranted.	Thank you for the comment. The non-potable water from the Contact Water Treatment Plant is not brine. Language regarding brine management has been added to the EAW to clarify how concentrated waste streams from the water treatment process will be handled. Additional detail will be provided in the EIS data submittal. **EDIT** **Added Language** Residual solid waste (e.g. brines) from the Contact Water Treatment Plant will be disposed of at a suitably licensed landfill. [R3_Cmt_#1390]
1391	6.b	1618		The “industrial stormwater area” comprises the majority of the Project footprint… Does this mean that there are industrial areas that are not being treated for runoff? Please, clarify.	Answer question; modify text as warranted.	Thank you for the comment. As described in the EAW, the industrial stormwater area comprises the majority of the Project footprint and includes areas subject to industrial activity as defined under the NPDES/SDS industrial stormwater permit. Portions of the Project footprint that are temporarily disturbed during construction but later stabilized and reclaimed will not require ongoing coverage under the industrial stormwater permit. These areas would be managed appropriately based on their final land use and status in accordance with applicable regulations.
1392	6.b	1618		If the Ore Transfer Building is not included as part of the industrial stormwater area for runoff treatment, how is the drainage from the roof being treated? Is it considered "contact water" and, therefore, goes to the treatment plant? Please, clarify.	Answer question; modify text as warranted.	Thank you for the comment. For clarity, water inside the Ore Transfer Building will be managed as contact water and treated accordingly, while water outside of the building, including the roof, will be managed as industrial stormwater. **EDIT** **Original** Stormwater that has contacted industrial activities or areas and is not contact water. The “industrial stormwater area” comprises the majority of the Project footprint which is outside the Ore Transfer Building (see Figure 5). **Modified** Stormwater that has contacted industrial activities or areas and is not contact water. The “industrial stormwater area” comprises the majority of the Project footprint which is outside, including the roof, the Ore Transfer Building (see Figure 5). [R3_Cmt_#1393]

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1393	6.b	1618	Figure 5	The arrows drawn on Figure 5 appear to show the existing surface drainage patterns, which does not make sense superimposed with the proposed mine layout and industrial water catchments. Please revise this figure to depict the proposed flow paths of stormwater during the mine operational phase.	Modify Figure to address comment.	Thank you for the inquiry. The figure has been updated.
1394	6.b	1619		Empty and loaded railcars would be stored at the railway yard. Site layout (Graphic 6.2, Lines 389-390) shows lettering for "rail yard" but designated space is unclear. Where on the site would the expected 120 railcars be stored? What would Talon do with ore and waste rock from Decline construction if BNSF did not transport 120 cars away from the site every 4 days? RGU notes the Draft Scoping Decision will likely identify the need for the EIS to address potential contingency strategies in the event rail disruptions or other events.	Answer question; modify text as warranted.	Thank you for the comment. As shown in the site layout and described in the EAW, the rail yard includes three parallel full unit train-length tracks, each capable of storing approximately 120 railcars. These tracks are located adjacent to the Ore Transfer Building and are designed to facilitate loading and exchange of unit trains. If rail service were disrupted or delayed, ore could continue to be stored within the enclosed Ore Transfer Building, which includes combined buffer capacity for up to 8,800 tons (8,000 tonnes) of material. In addition, undeveloped stope areas and temporary underground headings could be used to temporarily retain waste rock during decline construction. Talon anticipates addressing contingency strategies, including rail service interruptions, in greater detail as part of the Environmental Impact Statement (EIS) process and the Draft Scoping Decision development.
1395	6.b	1623		Does the 120 cars include an operational buffer that can adjust in timing variations from ore loading, when engines arrive to bring more empty railcars and take away full railcars? At these transition points, will there be 240 cars on the site? What are the project's expected given daily minimum and daily maximum numbers of railcars?	Answer question.	Thank you for the comment. As described in the EAW, the on-site rail yard includes three parallel full unit train-length tracks designed to accommodate a 120-car unit train. During train exchange operations, there may be up to 240 railcars on site simultaneously—120 loaded railcars staged for departure and 120 empty railcars delivered for the next loading cycle. The system is designed to allow for this transition and includes sufficient rail yard capacity to manage both sets of cars without disruption to operations. Approximately 30 railcars are loaded per day.
1396	6.b	1666		Talon states that contact water treated by its Plant need not be "potable" to be used both on the surface and injected underground to mine workings, but does not disclose the chemical composition of this "non-potable" water. The EAW plan may be inconsistent with Minnesota environmental standards and may affect the sizing of the treatment plant and, thus, both the layout and financial feasibility. The next iteration of the EAW must disclose the chemical composition of the "contact water," the "well water," and proposed "non-potable" water treated by the plant. This disclosure is necessary because Talon has already stated that water to be used from the Contact Water Treatment Plant for CRF (see Lines 985-988) could have sulfate content up to 2,000 mg/L and chloride levels up to 4,500 mg/L with a pH just above 4.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1397	6.b	1696		Virtually every mine encounters unexpected groundwater in cracks and zones not detected by probe holes. What is the capacity of the mine dewatering system to handle unexpected groundwater inflow (partly described in Section 12.b)? What is the emergency/contingency plan for unexpected groundwater inflow? Please, articulate in text.	Answer question; modify text as warranted.	Thank you for the comment. For a reference and potential learnings, please provide specific examples when mine inflow estimates using a numerical model under-predicted actual mine inflows when there existed an extensive baseline testing data set such as for the Talon Project for a crystalline bedrock settings? The pre-mining inflow estimates for the Eagle Mine, an underground mine in crystalline bedrock in Michigan, was 75 to 220 gallons per minute (Lundin Mining Corporation NI 43-101 Technical Report on the Eagle Mine, Upper Peninsula of Michigan, USA, Wardell Armstrong, 2014) that overestimated actual mine inflows. In 2023, it was reported that Eagle Mine is a relatively dry mine, and daily dewatering volumes are typically less than 10 gpm (Lundin Mining Corporation NI 43-101 Technical Report on the Eagle Mine, Michigan, USA, WSP, 2014). Talon is using a similar approach to include a range with conservatism in the estimated mine inflows and the water treatment plant capacity will be designed based on the high end of the range.
1398	6.b	1698		EAW admits the mine workings are expected to intersect local discrete zones and areas of enhanced permeability. RGU notes the Draft Scoping Decision will likely require for maps of fault zones to be provided based on exploration to date, or to model the degree to which this permeability will be increased by blasting activities. RGU also notes the Draft Scoping Decision will likely require plans for grouting or sealing fractures to be addressed in the Detailed Project Description for EIS preparation. An issue of interest will likely be assessment of faults, fractures, modeled inflow, mitigation, and specific plan for review of efficacy and feasibility to prevent massive inflow of groundwater.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1399	6.b	1702		Please, provide a basic description of the how groundwater flow into the mine will be monitored and reported. Also, in section 12, include a description of the groundwater flow modeling that will be used to determine potential effects on nearby wells and the environment.	Answer question; modify text as warranted.	Thank you for the comment. The volumes of water provided to and from the underground will be measured with flow totalizers and flow meters. Groundwater inflows will be calculated as the difference between measured inflows to the mine and measured outflows from the mine. **EDIT** **Added Language** The volumes of water delivered to and pumped from the underground workings would be continuously monitored using flow meters and totalizers. Groundwater inflows would be estimated by calculating the difference between the measured volumes of water supplied to the mine and the volumes pumped out. This approach would provide a practical method for tracking groundwater inflow over time and evaluating the effectiveness of inflow control measures. [R3_Cmt_#1399]

Comment No.	EAW Item No.	EAW v3 Line 1	Table, Figure, Graphic	Round 3 RGU Comment to Talon 04/10/2025	Requested Action by RGU	Talon Response and Treatment in EAW 06/23/2025
1400	6.b	1739		RGU notes the Draft Scoping Decision will likely require the EIS to identify the applicable WQS and criteria and the volumes to be treated for both mine reuse, dust control, etc. and discharge to surface waters.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1401	6.b	1740		Reverse osmosis treatment can produce effluent that contains very low hardness that can be harmful to the receiving environment. RGU notes the Draft Scoping Decision will likely require consideration of any risks of very low hardness waters discharged to the environment and measures available to mitigate any adverse impacts.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1402	6.b	1784		If known what specific treatment works and capacity is Talon proposing for the Contact Water Treatment Plant?	Answer question.	Thank you for the comment. The Contact Water Treatment Plant will be designed to treat the upper level of water inflows within the mine as well as water that has directly contacted ore and/or waste rock within the Ore Transfer Building. Details regarding the specific treatment works and capacity for the Contact Water Treatment Plant will be provided as part of the EIS data submittal. No changes to the EAW are proposed at this time.
1403	6.b	1786		Talon proposes to discharge "non-potable" water directly to Class 2B and 2D waters. RGU notes the likely chemical composition of this non-potable water will need to be known to assess potential impacts to receiving waters. Regarding unnamed creek (AUID 07010103-735), RGU notes the EIS will likely more formally describe the receiving water at that site as "perennial drainage ditch" or "canal/ditch," both of which are accepted naming conventions. In addition, where relevant the AUID used by MPCA will also likely be used where appropriate.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1404	6.b	1788		The Tamarack River is a wild rice water. Ensure this is identified in Item 12.	Modify EAW to address comment.	Thank you for the comment. Figure 15 has the Tamarack River mapped as a wild rice water. The EAW was edited accordingly. **EDIT** **Original** Within HUC12 watersheds #070101030603 and #070101030504, Mud Lake (Minnesota Public Water Inventory (PWI# 01-0029-00) and Tamarack Lake (PWI# 09-0067-00) are listed by the DNR as wild rice waters (Figure 15). Big Sandy Lake is also listed as a wild rice water. **Modified** Within HUC12 watersheds #070101030603 and #070101030504, Mud Lake (Minnesota Public Water Inventory (PWI# 01-0029-00) and Tamarack Lake (PWI# 09-0067-00) and Tamarack River (PWI# 07010103-757, 07010103-758) are listed as wild rice waters. (Figure 15). Big Sandy Lake is also listed as a wild rice water. [R3_Cmt_#1404]
1405	6.b	1813		Why list so many types of units for the portable water well (gpd, gpm, lpd and lpm).	Consider comment; modify EAW as warranted.	Thank you for the comment. Multiple units were provided for informational clarity and ease of reference for different audiences. No changes are proposed.

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1406	6.b	1813		Why did you shift on how to display the per in Liters per min? Why not keep the consistency of using p, for example lpm vice L/min.	Consider comment; modify EAW as warranted.	Thank you for the comment. The use of L/min aligns with international standards for metric unit notation.
1407	6.b	1814		Commenter notes the proposed filtration system is preliminary as potable water treatment should be determined once the source water quality is known.	Consider comment; modify EAW as warranted.	Thank you for the comment. The EAW text has been clarified accordingly. **EDIT** **Original** Raw water would be circulated through a filtration system consisting of a greensand filter, followed by a cartridge filter, into a chlorine contact tank. After that, the stream would leave the chlorine contact tank and feed into a 10,000-gallon (37,854-liters) holding tank. **Modified** Raw water would be circulated through a filtration system consisting of a greensand filter, followed by a cartridge filter, into a chlorine contact tank. After that, the stream would leave the chlorine contact tank and feed into a 10,000-gallon (37,854-liters) holding tank. Final potable water treatment design would be determined based on the results of source water quality testing. [R3_Cmt_#1411]
1408	6.b	1824		How does Talon propose to address maintenance of pre-development runoff discharge rates for different storm events (e.g., 1-year; 10-year; 100-year) from the industrial stormwater management system?	Answer question; modify text as warranted.	Thank you for the comment. The details regarding how the Project would maintain or manage runoff discharge rates for various storm events will be provided as part of the EIS data submittal.
1409	6.b	1824		Regulatory Guidance. NOAA Atlas 14 precipitation depth and other requirements of the Construction Stormwater General Permit and Industrial Stormwater General Permit must be used in the design and sizing of pond(s) for industrial stormwater detention/retention. When considering the impacts of climate change and the fact that Minnesota is seeing more frequent and intense rain events, the most protective design should use the upper end of the 90% confidence interval in Atlas 14 to determine the size of storm events when sizing onsite stormwater practices. Best Management Practices (BMPs) as described in the Minnesota Stormwater Manual must also be used where applicable and appropriate	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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1410	6.b	1830		Non-potable treated water used for dust suppression would enter adjacent watershed. The Draft Scoping Decision will likely require a Water Chemical Balance to account for this activity in the impact assessment for the EIS.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1411	6.b	1840		How will the wet sediment basin treat stormwater that comes in contact with industrial activates that that may involve contact with the sulfide metallic waste rock or ore?	Answer question.	Thank you for the comment. The Project design prevents exposure of sulfide-bearing waste rock and ore to stormwater by enclosing these materials within buildings. As a result, stormwater runoff directed to the wet sediment basin will not come into contact with sulfide materials. Water that has the potential for contact with ore or waste rock would be managed separately through a dedicated contact water collection and treatment system, not through the wet sediment basin.
1412	6.b	1845		The submittal indicates that infiltration systems were considered for stormwater management but were not deemed viable given the site's depth to groundwater (seasonally saturated soils). Infiltration/filtration BMP feasibility needs to be explored thoroughly. Regulatory Guidance: MPCA will independently assess the proposed design for compliance with Sections 15 (Permanent Stormwater Treatment System) through 18 of the Construction Stormwater General Permit.	Consider comment; modify EAW as warranted.	Thank you for the comment. The submittal outlines that infiltration-based stormwater management practices were considered but not pursued due to site conditions, including the presence of seasonally saturated soils and limited separation to groundwater. Talon acknowledges that the Minnesota Pollution Control Agency will independently evaluate the proposed stormwater management design for consistency with applicable requirements under the Construction Stormwater General Permit (Sections 15 through 18).
1413	6.b	1859		Not enough information to provide comment. Please provide more information including specific BMPs and a discussion of temporary sediment ponds during construction and project phasing considerations	Answer question.	Thank you for the comment. Detailed information regarding specific best management practices, construction phasing, will be developed and submitted as part of the Stormwater Pollution Prevention Plan during the permitting phase. These elements are most appropriately addressed in coordination with regulatory agencies as part of the Construction Stormwater General Permit application.
1414	6.b	1867		Regulatory Guidance. Industrial stormwater may need treatment in addition to sedimentation depending on its chemical composition. Testing and appropriate treatment would be required to ensure compliance with discharge limits and maintain water quality standards in surface waters.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1415	6.b	1875		Clarify sentence to be clear. "Toilet waste would be managed separately from gray water, the latter which includes water from activities such as showering and handwashing."	Modify EAW to address comment.	Thank you for the suggestion. The sentence in question is both grammatically correct and technically accurate. While stylistic preferences may vary, no revision is necessary as the current language conveys the intended meaning clearly and aligns with the overall document style.
1416	6.b	1880		How does estimated daily toilet waste volume compare to anticipated receiving wastewater facility? Please, address.	Answer question.	Thank you for the comment. A specific receiving wastewater treatment facility has not yet been designated. Once a facility is identified, the volume of toilet wastewater, including estimated daily toilet waste, would be evaluated in the context of the facility's treatment capacity and acceptance criteria.

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1417	6.b	1882		How will impacts on the watershed and groundwater from potential leakage or failure of the holding tank be addressed?	Answer question; modify text as warranted.	Thank you for the comment. The Environmental Worksheet (EAW) describes that the holding tank would be designed, constructed, and maintained in compliance with applicable Minnesota Pollution Control Agency (MPCA) standards for subsurface sewage treatment systems. These standards include specific requirements for tank construction, siting, and testing to ensure integrity and minimize the risk of leakage or failure. Additionally, the system would be subject to regular inspections and maintenance to ensure ongoing performance. Together, these measures are designed to prevent impacts on the watershed and groundwater from potential leakage or failure of the holding tank.
1418	6.b	1882	Graphic 6.16	Talon does not plan to treat its toilet waste onsite, but to send it to an offsite treatment plant. Has a facility been identified to receive and treat this waste?	Answer question.	Thank you for the comment. A specific receiving wastewater treatment facility has not yet been designated. Details will be provide with the EIS data submittal.
1419	6.b	1885		If known, the receiving WWTP for collected sewage waste should be identified. The Draft Scoping Decision will likely require a receiving facility to be as soon as known for the EIS traffic analysis and possibly other studies.	Consider comment, answer questions, and modify text as warranted.	Thank you for the comment. A specific receiving wastewater treatment facility has not yet been designated. Details will be provide with the EIS data submittal.
1420	6.b	1885		The document includes reference "...[T]o a nearby municipal wastewater treatment facility for disposal." If known, where would this be? Tamarack? McGregor? Cromwell? Also if known, will they have the capacity to accommodate the site's Toilet Waste? If they don't have the capacity, will multiple wastewater treatment facilities be accessed? RGU notes that specific receiving facility(ies) should be identified over the course of the EIS to support traffic analysis assessment (among other potential impacts).	Answer question.	Thank you for the comment. A specific receiving wastewater treatment facility has not yet been designated. Details will be provide with the EIS data submittal.
1421	6.b	1885		EAW states that toilet waste would be transported to "a nearby municipal wastewater treatment facility for disposal." Is Talon proposing to send wastes to the Tamarack Wastewater Treatment plant for treatment, to dispose of them in a landfill, or some other option? Should be specified in EAW.	Answer question; modify text as warranted.	Thank you for the comment. A specific receiving wastewater treatment facility has not yet been designated. Details will be provide with the EIS data submittal.
1422	6.b	1891		Why is the Toilet waste design flow calculation modified by 0.4 Toilet waste multiplier?	Answer question.	Thank you for the comment. Minnesota Rule 7080.2240 requires that to qualify as a gray water system, the system must use 60 percent of the flow values listed in parts 7080.1850 to 7080.1885. Based on this rule, Talon inferred that 40 percent of the total estimated design sewage flow from Table 1 in Minnesota Rule 7081 (Estimated Design Sewage Flow From Other Establishments) represents toilet waste. Accordingly, the toilet waste design flow was calculated using a 0.4 multiplier.
1423	6.b	1898		How does estimated daily gray water volume compare to anticipated receiving wastewater facility? Please, address.	Answer question.	Thank you for the comment. The estimated daily volume of gray water is approximately 3,375 gallons (12,800 liters). This estimate is based on 150 personnel, each generating 15 gallons per day (56.8 liters/day), with an adjustment factor of 1.5 applied to account for the extension of work shifts from 8 hours to 12 hours.

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						The anticipated receiving facility, the Contact Water Treatment Plant, is designed to accommodate significantly greater flows associated with mine inflow. A conservative range of 800 to 1,600 gallons per minute (3,028 to 6,057 liters per minute) was developed by multiplying the calculated inflow rate of 800 gallons per minute by a factor of two, considering the conductive zone frequency and rate along the mine development. In comparison, the daily gray water volume represents 0.3-0.15% of the total anticipated inflow to the Contact Water Treatment Plant.
1424	6.b	1904		Why is the Grey Water design flow calculation modified by 0.6 Toilet waste multiplier?	Answer question.	Thank you for the comment. Minnesota Rule 7080.2240 requires that to qualify as a gray water system, the system must use 60 percent (0.6 multiplier) of the flow values listed in parts 7080.1850 to 7080.1885.
1425	6.b	1914		Reviewer notes Talon proposal to build a new substation for GRE power needs review for CO2 footprint consequences, including comparison of energy required to source metals from recycling. GRE portfolio energy mix in 2021 was 57% coal, 15% market (often natural gas) and 3% natural gas. RGU will consider this recommendation in development of the Draft Scoping Decision.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1426	6.b	1924		Diesel electric generation emits NOx, PM, CO, carcinogens, and greenhouse gases. Alternatives process should evaluate solar generation for the energy needed before the substation is commissioned.	Advisory. To be considered during alternatives process.	Thank you for your comment. This topic may be reviewed during the development of alternatives as part of the Environmental Impact Statement (EIS) process, if determined relevant by the Responsible Governmental Unit (RGU).
1427	6.b	1927		Commenter notes the expected use of the generators during construction may exceed the definition of emergency engines (EPA limits 100hrs/year); if correct, then this may impact classification as emergency backup power for critical systems in the transition from construction to operational phases (or other periods). Please, address in text if appropriate. RGU advises that although the final classification of generator engines (e.g., stationary, full-time sources) would be determined in permitting, a preliminary, assumed classification will likely be necessary for any related EIS analyses.	Consider comment, answer questions, and modify text as warranted.	Thank you for the comment regarding the use of generators during construction and operations. As described in the EAW, generators used during the construction phase would be temporary and intended to supplement construction power needs. These construction generators are separate from the permanent generators that would be installed during operations to provide emergency backup power for critical systems protecting life, the environment, and property. For purposes of the Environmental Impact Statement (EIS) analysis, the operational generators are preliminarily assumed to be classified as emergency engines. Final classification would be determined during permitting, taking into account actual operating parameters and regulatory requirements.
1428	6.b	1989		Detail the specifications for the "shorter lighter weight railcars." How many cars could be stored on each track? RGU notes the Draft Scoping Decision will likely require the Detailed	Answer question.	Thank you for the opportunity to provide additional clarification. As described in the Rail Yard section, "To create an efficient exchange of unit train sets while minimizing the footprint, the rail yard would provide three parallel full unit

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				Project Description to provide an illustration of the proposed three parallel full unit train length tracks for EIS preparation.		train length tracks adjacent to the mine surface facilities connected at both ends to accommodate a loaded unit train set for release to BNSF, receipt of the empty unit train set returning for loading and a “run-through” track to maintain full access (see Figure 4). [R2_Cmt_#222] The use of shorter lighter weight railcars would result in these parallel tracks being less than 5,500 ft (1,676 m) in length allowing a single 0.3-mile (0.48 km) spur track to the mainline wye connection. The mainline connection would be designed as a wye connection providing efficient access from either the west or east and allows BNSF to turn locomotives (or railcars) around as necessary. Each intersection of the wye would be accessed by a new gravel road for switch operation and maintenance. This road would be an extension of the existing driveway for the Talon-owned property immediately adjacent to the BNSF track (Figure 3)." In accordance with the RGU’s direction, Talon anticipates providing an illustration of the proposed three full-length parallel tracks and associated infrastructure, including the run-through track and wye connection, as part of the Detailed Project Description to support Environmental Impact Statement (EIS) preparation.
1429	6.b	2005		Proposal is that 3,300 tons of ore would fill 30 railcars per day. If known, provide specifications for size of ore blocks and volume of both ore and railcars. Payload capacity is 115.7 tons (line 1520), but volume not specified.	Answer question.	The EAW describes that approximately 3,300 tons of ore would be transported daily using 30 railcars, with an estimated payload capacity of 115.7 tons per car. The specific volume of ore and size of ore fragments will depend on material handling practices and final railcar selection, which continue to be refined as project planning progresses. Additional detail on ore characteristics, volume, and transportation logistics will be included in the Environmental Impact Statement (EIS) data submittal.
1430	6.b	2020		Text notes: "In the event of a temporary BNSF slowdown, ore would continue to be stored in the enclosed Ore Transfer Building or in the underground." If known, provide a description of how, where, and the likely volume capacity that would be required under these circumstances. RGU notes the Draft Scoping Decision will likely require some basis for assumptions regarding potential BNSF slowdowns, for example information on previous slowdowns. Scoping Decision will also likely identify need to identify contingency plans for BNSF slowdown or construction delays in Detailed Project Description.	Answer question.	Please see the response to comment 1373.
1431	6.b	2061		A commenter notes regarding the crushing of waste rock in Ore Transfer Building, if known what is initial size that is crushed to 4 inches before feeding into backfill plant? What crusher would be used? What dust/indoor air particulate controls (if any)? Is this crusher separate from crusher used for ore?	Answer question.	Thank you for your question. The precise crushing equipment and material handling flowsheet will be finalized as engineering for the project progresses. As the EAW states "The waste rock would be fed into the backfill material crushing plant where the material would be crushed to less than 4 inches (10.2 cm). Dust would be controlled using best

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						management practices in accordance with the project's Fugitive Dust Control Plan developed as part of the EIS and permitting process."
1432	6.b	2062		Would CRF be premixed or transferred wet to the mine and mixed underground? What percent of the voids in the mine would be filled with CRF? With waste rock that is not CFR? During the life of the mine or subsequent to closure?	Answer question.	Thank you for the comment. Cemented rockfill (CRF) would be mixed on the surface within the Ore Transfer Building prior to being transported underground for placement. Information regarding the estimated percentages of mine voids expected to be filled with CRF and with uncemented waste rock, both during the operational life of the mine and following closure, will be provided with the Environmental Impact Statement (EIS) data submittal.
1433	6.b	2070		Are train cars considered part of "any vehicle"?	Answer question; modify text as warranted.	Thank you for the comment. As described in the submittal, the reference to "any vehicle" is intended to encompass mobile equipment such as trucks, loaders, skid steers, and similar vehicles operating at the site. Train cars are not considered "vehicles" within this context. Rather, railcars are addressed separately as part of the rail loadout operations described under the Rail Yard section and are handled through specific railcar procedures, including dedicated equipment for shunting and loading within the Ore Transfer Building
1434	6.b	2072		Wash bay is described to have a concrete slab floor. What flooring is proposed for the balance of the Ore Transfer Building?	Answer question; modify text as warranted.	Thank you for your question. As the EAW states: "Construction work on the erection of the Ore Transfer Building would also commence immediately after site preparation. Once the site for the building has been leveled, the foundations would be excavated, concrete poured, and the concrete slab on grade would be constructed after compaction of the sub-base."
1435	6.b	2089		A commenter suggest that berms should be placed around the diesel storage tanks in case of spill.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1436	6.b	2102		On the days the 120-car unit train would pull out of the site, how many loaded railcars will be on site to start the next shipping cycle so that there wouldn't be an interruption of operations?	Answer question.	Thank you for the comment. The expectation is that each incoming unit train would deliver approximately 120 empty enclosed railcars to the site upon arrival for the next loading cycle. This approach would allow loading operations to continue without interruption, as empty railcars would be available on site immediately following the departure of the prior loaded unit train.
1437	6.b	2102		The RGU notes the Draft Scoping Decision will likely require consideration of ventilation rates independent of other Minnesota ore processing facilities to address air quality circumstances somewhat unique to the Tamarack Mine if constructed.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1438	6.b	2110		If known, how would "buffer area" of 4,400 tons in Ore Transfer Building work if there is a BNSF slowdown? Would additional ore be left in the mine (if so, where?), loaded to additional railcars (estimate of how many?), stored in the Ore Transfer Building (how much total)? RGU notes that Draft Scoping Decision will likely require the Detailed Project Description to provide information in these issue areas to support related impact assessment and identification of contingency actions.	Answer question.	Thank you for the comment. As described in the submittal, the Ore Transfer Building would maintain an internal storage buffer of approximately 4,400 tons of ore to provide operational flexibility in the event of a temporary BNSF slowdown. This capacity would allow operations to continue without immediate interruption for over one day at the anticipated daily production rate of approximately 3,300 tons per day. If a slowdown were to exceed the available buffer capacity, contingency options would include temporary retention of ore underground in active stope voids or operational headings before haulage to the surface. In addition, if sufficient empty railcars are available on site, ore could continue to be loaded into railcars and staged within the rail yard until the next scheduled unit train exchange.
1439	6.b	2112		This section states that 120,000 cfm + 75,000 cfm + 60,000 cfm of building ventilation and filtration with baghouse, is needed for Ore Transfer Building, and states the baghouse will be inside the building. Commenter notes this is not common practice as the proposed baghouse(s) would be enormous and likely loud. RGU notes the Detailed Project Description will likely require base data around baghouse operations to support the impact assessment(s) for noise, air quality, and energy utilization.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1440	6.b	2112		RGU notes that current terminology (ISO 23875:2021) refers to airborne particulates, fine matter that is hazardous to human health, and an air quality control system. The public release SEAW will likely use more precise terminology to describe applicable mining air quality standards.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1441	6.b	2113		In order for BNSF to take custody of the railcars and their contents, Talon will need to fully disclose the chemical and content of the transported material.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1442	6.b	2123		Confirm that sizing of waste rock crusher and waste rock storage within the Ore Transfer Building were based on the capacity of the modular cement mixer, Simen Wet Beton 180 UL.	Modify EAW to address comment.	Thank you for your question. The sizing of the waste rock crusher and waste rock buffer areas are determined by anticipated mine rates and backfill demand requirements.
1443	6.b	2150		Talon relies on a Compressed air pipeline more than two miles (14,750 feet) long, and a Compressed Air Plant within the Ore Transfer Building. Where is the "ambient" air entering the plant sourced from? How would Talon prevent airborne contaminants? What would the compressed air be used for?	Answer question.	Thank you for the comment. Ambient air for the Compressed Air Plant would be drawn from the exterior of the Ore Transfer Building. Compressed air would be used for underground mining activities, which could include operation of pneumatic equipment, application of shotcrete, instrumentation, and general utility purposes.
1444	6.b	2183		What is difference in dimensions, materials used, open air access of Eagle Mine and proposed Talon mine?	Answer question.	The reference to the Eagle Mine portal was included in the EAW to provide a general visual comparison. As noted, the Tamarack Mining Project's (TMP) portal would be similar in

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						appearance but would connect directly to the Ore Transfer Building, reducing exposure to open air.
1445	6.b	2213		In Section 6.22 on Reclamation and Closure, flooding of the underground mine is described for post-operations. The RGU notes a likely issue identified during scoping could include reference to flushing of oxidized products (existence of a "first flush" as an important geochemical source term) during mine flooding. In addition, the Draft Scoping Decision will likely indicate that the EIS will include water quality predictions to assess water quality impacts and potential mitigation (if needed) as a result of the first flush following flooding of the underground openings. As indicated in Lines 2230-2237, Talon already anticipates this work in the EIS will likely need to assess the need for post-operational treatment in early closure for the first flush (for example may be proposed for 10 years (or a suitable timeline)). Commenter notes the timing and design of the bulkheads and plugs installed to maintain flooding of the underground should consider the potential need for this treatment.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1446	6.b	2213		RGU notes the Draft Scoping Decision will likely require for the EIS to conceptualize geochemical risks for the proposed mine design at closure, which might include geochemical understanding of the lithology and alterations to develop appropriate geochemical rock types and test materials according to this conceptual understanding. This information is needed for developing an appropriate mine design that is suitable for mine closure.	Consider comment; modify EAW as warranted.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1447	6.b	2214		RGU notes the Draft Scoping Decision will likely require description of preliminary reclamation and closure activities in the Detailed Project Description to allow for impact assessment and identification of mitigation for the EIS. Impacts required detailed assessment include potential groundwater water quality impacts during closure from water migration through the disturbed mining zone, both in surficial Quaternary materials and shallow and deep bedrock.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1448	6.b	2232		Describes management of "fresh and exhaust air" using Raise #1 (295 feet) first for exhaust and then for fresh air supply intake. Please explain how fresh air would reach more than 2,000 feet deep and 14,750 feet long from the fresh air intake at 295 feet.	Answer question.	Thank you for the comment. As described in the submittal, during operations, "Ventilation air would be drawn into the Portal and Surface Raise #1 to ventilate the workings down to the bottom of the mine. Fresh air would sweep across each of the levels and be channeled into the exhaust system, which would comprise a series of raises and transfer drifts that would terminate in the main exhaust raise." Graphic 6.14 depicts this design.
1449	6.b	2239		What is the rationale for not backfilling the mine development areas outside the orebody?	Answer question.	Thank you for the comment. From a geotechnical standpoint, development areas outside the orebody, such as ramps and drifts, are smaller in size, and supported as necessary to maintain long-term stability. Backfilling these areas would not

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						significantly improve geotechnical conditions, so backfill efforts are focused on larger mined-out stopes.
1450	7.a	2352		Past temperature trends are discussed on an annual basis when certain seasons have experienced greater warming (e.g. winter and spring nighttime temps have seen the greatest increases). There may be aspects of project activities that will be affected by seasonal shifts or project impacts that will be exacerbated by seasonal shifts, therefore it is important to generally discuss those past trends here. Please discuss and add to text.	Modify EAW to address comment.	Thank you for the comment. The text of the EAW has been edited. **EDIT** **Added Language** By mid-century, Aitkin County is projected to experience a modest increase in annual average temperatures of approximately 3°F (-16.1°C), with more frequent hot days above 90°F (32.2°C) and warmer nighttime minimums, particularly in winter and spring. While annual precipitation is expected to increase slightly, the number of wet days is projected to remain relatively constant, resulting in more rainfall during events. Despite these changes, the overall climate is anticipated to remain within the historical range of variability already considered in project design. (CMRA, n.d.) [R3_Cmt_#1450]
1451	7.a	2358		A temperature trend of -0.22 C/decade is characterized as "nearly constant" while a trend of +0.14 over the same time period is characterized as "increasing". Please use consistent language or clarify these designations.	Modify EAW to address comment.	Thank you for pointing out the inconsistency in how temperature trends were described. The temperature trend from 1990 to 2022 was previously misstated as -0.22°C per decade; this was a typographical error. The correct value is -0.04°F (-0.02°C) per decade. With this correction, the description of the trend as “nearly constant” more accurately reflects the observed data. We have reviewed the phrasing to ensure consistent and appropriate language is used when characterizing trends. **EDIT** **Original** Maximum annual temperature trends have increased by a rate of approximately 0.25°F (0.14°C) per decade from 1895 through 2022 and stayed nearly constant from 1990-2022 -0.4°F (-0.22° C) per decade. **Modified** Maximum annual temperature trends have increased by a rate of approximately 0.25°F (0.14°C) per decade from 1895 through 2022 and stayed nearly constant from 1990-2022 -0.04°F (-0.02° C) per decade. [R3_Cmt_#1451]
1452	7.a	2397	Graphic 7.4	Please add "September" in Graphic 7.4 title	Modify EAW to address comment.	Thank you for the suggestion. The title to the graphic will be updated as requested.

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1453	7.a	2419	Graphic 7.4	Please eliminate the sentence "To provide context for contemporary conditions, recent data from 1990-2022 were reviewed, showing a downward trend in PDSI values of -0.20 per decade, suggesting the region is drier in September but remains predominantly wet overall, with a mean PDSI of 1.26." and eliminate the 1990-2022 line in Graphic 7.4. Using 32 datapoints produces results that are statistically irrelevant and leads to the biased conclusion that wet conditions are in decline while a more robust set of data shows otherwise.	Modify EAW to address comment.	Thank you for the comment regarding the use of the 1990–2022 PDSI trend and its inclusion in Graphic 7.4. The perspective on statistical considerations, particularly the length of record and trend robustness, is appreciated. While it is recognized that 32 years represents a shorter period, the intent of including this timeframe is to offer a conceptual view of contemporary conditions rather than to override or diminish the long-term trend. Given the inherent variability of environmental systems, examining trends over multiple time horizons provides context for both historical and recent dynamics. It is also worth noting that the early portion of the long-term dataset includes multiple significant drought periods, which exert considerable influence on the overall trend. Talon includes both the long-term and recent trends to provide a balanced interpretation of changing late-summer moisture conditions and to reflect the range of conditions that may be relevant for planning and environmental review.
1454	7.a	2425		The Minnesota EQB released EAW guidance for incorporating climate adaptation and resilience in June 2024. Pursuant to that guidance, the response here should compare the climate information included in the EAW with the information provided by Minnesota CliMAT (Climate Mapping and Analysis Tool) which makes climate change projections available at the County level. Please make reference in text.	Modify EAW to address comment.	Thank you for the comment. The information presented in the EAW provides a sufficient basis for scoping the Environmental Impact Statement (EIS). Additional detail, including climate projections and their potential relevance to project design, will be provided in the data submittal for the EIS.
1455	7.a	2426		Projected temperature trends are discussed on an annual basis when certain seasons are expected to experience greater warming (e.g. winter and spring nighttime temps will see greatest increases). There may be aspects of project activities that will be affected by seasonal shifts or project impacts that will be exacerbated by seasonal shifts, therefore it is important to generally discuss those trends here. Please discuss and add to text.	Modify EAW to address comment.	Please see the response to comment 1450.
1456	7.a	2447		Text reads "...vary by climate model from the 1980-1999 30-average baseline." Perhaps it should read "...vary by climate model from the 1980-1999 30-year average baseline."	Modify EAW to address comment.	Thank you for the suggestion. **EDIT** **Original** "...vary by climate model from the 1980-1999 30-average baseline." **Modified** "...vary by climate model from the 1980-1999 30-year average baseline."

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1457	7.a	2452	Graphics 7.6 & 7.7	Please consider including the Projected Annual Temperature Trends and the Projected Annual Precipitation Trends for RCP 8.5 to capture the range of likelihood.	Modify EAW to address comment.	Thank you for the comment. The information presented in the EAW is intended to support the scoping of the Environmental Impact Statement (EIS) and is sufficient for that purpose. Talon recognizes that RCP 8.5 represents a higher-emissions scenario that may provide useful context for long-term climate planning. These additional projections, including potential worst-case outcomes, will be considered where relevant as part of the detailed analysis conducted during the EIS phase.
1458	7.a	2467		The submittal discusses the projection of an increase in 100-year storm intensity but does not discuss projections for 200-yr or 500-yr storm events/intensities. RGU notes the Draft Scoping Decision will likely propose the full range of storm events/intensities that should be assessed to understand the efficacy of stormwater management and infrastructure design.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1459	7.a	2467		The submittal states: "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." The Draft Scoping Decision will likely indicate the appropriate 100-year storm intensities to assess all water controls and infrastructure for efficacy and associated impacts. For example, using the 2060 EPA Analysis values may be appropriate to consider conditions of a fully-reclaimed site in closure.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1460	7.a	2467		How will the increase in storm event intensity be accounted for? Due to the large amount of impervious surface added by this proposed project, there will be a larger volume and peak discharge rate of stormwater runoff post construction. In addition to constructing stormwater treatment ponds to meet construction stormwater permit requirements, the MPCA suggests that any stormwater treatment ponds be designed so that the post-project peak discharge rates for the 2,10 and 100-yr storm events are equal to, or lower than the pre-project peak discharge rates for those storm events. This will help to protect the receiving channel from erosion cause by peak flows that exceed current conditions. The most protective design when considering the impacts of climate change and the fact that Minnesota is seeing more frequent and intense rain events should use the upper end of the 90% confidence interval in Atlas 14 to determine the size of storm events when sizing stormwater ponds on site.	Consider comment, answer questions, and modify text as warranted.	Thank you for the comment. The Tamarack Mining Project's stormwater management system has been designed to meet or exceed the requirements of the Minnesota Pollution Control Agency (MPCA) Construction Stormwater General Permit. Additional analysis of system performance and resilience to future precipitation trends will be addressed in the EIS as project design is further refined.

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1461	7.a	2471		The submittal states at Lines 2468-69 that: "These projections suggest heightened storm intensity over the long term." In this regard, a commenter notes: From 2000-2020, there were eight 100-year storm events in northeastern Minnesota. RGU notes the Draft Scoping Decision will likely require inclusion of a conservative estimated severe storm recurrence interval for the relevant EIS analyses.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1462	7.a	2476		The EAW states "The methodology and sources for future climate change projections used on the various assessments would be detailed in the EIS data submittal. If known, please include a short statement about the climate change methodology to be used. RGU notes the Draft Scoping Decision will likely include a high level summary statement detailing the climate change methodology to be used.	Modify EAW to address comment.	Thank you for the comment. The Environmental Assessment Worksheet (EAW) identifies that the methodology and sources for future climate change projections will be detailed in the Environmental Impact Statement (EIS) data submittal.
1463	7.a	2479		The submittal states "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." RGU notes the Draft Scoping Decision will likely acknowledge that given uncertainty in GCM's, the downscaling of GCM's, and climate change a conservative approach would be to consider mid-century projections in assessing vulnerabilities, risk, and climate change adaptation strategies. This could take the form of a comparative approach addressing long-term climate change with a 7-10 years analysis coupled with a conservative analysis. In addition, it should be noted the 7-10 year window for completion may be coupled with a longer, more conservative project lifespan again to be used for comparative purposes.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1464	7.a	2479		Please discuss impact of expected long term climate change hazards on plans for reclamation. The submittal only discusses the project operational phase of 7-10 years despite describing post-operation project design plans in Item 6.	Modify EAW to address comment.	The EAW describes the anticipated project operational phase as lasting 7 to 10 years, but also includes a general description of post-operation plans in Item 6. The purpose of the EAW is to support the scoping of an Environmental Impact Statement (EIS), and therefore does not provide detailed reclamation specifications or associated evaluations at this stage. Consideration of long-term climate trends, including precipitation and temperature changes, would inform the development of reclamation and closure plans during the EIS and permitting phases. These plans would be based on the best available climate science at the time of their development and would be designed to ensure long-term stability and function under a range of plausible future climate conditions.

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1465	7.a	2481		Data needed for the timeframe of the Project can be requested from UMN. RGU notes the Draft Scoping Decision may identify use of the 2040-2059 datasets to analyze climate impacts due to uncertainties to provide for a conservative assessment of climate change impacts for the EIS.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1466	7.b	2492	Table 7.1	Climate considerations beyond "more frequent and intense rain events" should be stated, including changes in average annual temperature, changes in daily maximum temperatures, projected increases in winter time lows, timing of precipitation (i.e., wetter springs, drier summers, shorter snow seasons, heavier rain events, and longer dry periods (drought conditions)).	Modify EAW to address comment.	Please see the response to comment 1468.
1467	7.b	2492	Table 7.1	Climate change will impact more than just stormwater management and infrastructure design. Table 7.1 should be more inclusive of the other impacts and adaptation strategies.	Modify EAW to address comment.	Please see the response to comment 1468.
1468	7.b	2492	Table 7.1	Adaptation considerations for the Project design are insufficient. Consider adding more detail to this part of the table.	Modify EAW to address comment.	Thank you for the comment. Table 7.1 of the Environmental Assessment Worksheet has been updated. The Tamarack Mining Project design incorporates resilience measures in response to observed and projected climate trends.
1469	7.b	2492	Table 7.1	Please clarify what hazardous waste materials may be produced, how an increase in frequency or intensity of rain events might impact contamination from hazardous waste materials, and describe any adaptation efforts to prevent hazardous waste material contamination in the event of frequent or intense rains.	Modify EAW to address comment.	Talon does not anticipate the generation of significant quantities of hazardous waste. If any hazardous waste is generated, it would be handled, stored, and managed in accordance with applicable federal and state regulations, including containment and labeling requirements designed to minimize risk of release. Potential impacts from increased frequency or intensity of rainfall events would be considered during the development of storage and containment practices, which are required to comply with Minnesota Pollution Control Agency (MPCA) hazardous waste management regulations. Adaptation measures, such as secondary containment and covered storage, would be evaluated and implemented as appropriate to ensure protective management under a range of weather conditions, including heavy rainfall. Further evaluation of potential hazardous waste generation and associated mitigation strategies would be included in the Environmental Impact Statement (EIS) and relevant permit applications, as required.
1470	7.b	2492	Table 7.1	EAW adaptations to climate change do not address known history of Aitkin County flooding and exacerbation by climate change; statements about ponds and resiliency require more supporting evidence to come forward in EIS analyses.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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1471	7.b	2492	Table 7.1	In the Project Design row of the table, the "Project Information" column should not only mention a loss of forest cover and wetlands but the creation of approximately 55 acres of new impervious surface that will result in a large increase in the volume and peak discharge rate of stormwater runoff. In the "Adaptations" column - the project proposer should commit to design its stormwater treatment system to match or reduce the pre and post peak discharge rates for the 2, 10 and 100-yr storm events. This will help protect that downstream conveyance system from erosion and scour due to increased flows from the increase in impervious surfaces. The most protective design when considering the impacts of climate change and the fact that Minnesota is seeing more frequent and intense rain events should use the upper end of the 90% confidence interval in Atlas 14 to determine the size of the storm evens when sizing stormwater ponds on site.	Modify EAW to address comment.	Please see the response to comments 1462 and 1468.
1472	8	2506	Table 8.1	Commenter offers that there appears to be no restoration efforts for impacted wetlands at reclamation and closure for the project? To clarify the RGU offers the following Regulatory Guidance: The WCA process as implemented through the Permit to Mine occurs during permitting and requires wetlands to be replaced in advance of or concurrent with the actual impact. Although WCA would be satisfied prior to reclamation and closure, an applicant could restore wetlands as part of the reclamation process but would not be part of the WCA replacement plan process.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1473	9	2519	Table 9.1	Table 9.1 references the Water Supply Well Notification submittal to MDH, but does not mention the plan review and approval requirements outlined in Minnesota Rules, part 4720.0010. This requirement should be added to the table.	Modify EAW to address comment.	Thank you for the comment. The requirement will be added to Table 9.1.
1474	9	2519		The submittal states Talon will need an Underground Injection Control Permit. What part of the project leads to the belief that such a permit would be needed, including depths, locations, and materials that would be injected.	Answer question.	Thank you for the comment. The reference to the Underground Injection Control (UIC) Permit will be removed because the project no longer includes a subsurface sewage treatment system (SSTS).
1475	10.a.i	2529		How would hunting be affected by the construction and operation of the project? Would there be seasonal restrictions?	Answer question; modify text as warranted.	Thank you for the comment. The EAW has been updated to clarify that public access to the active Project Area would be restricted for safety reasons, precluding hunting within the mine site, and that no additional seasonal restrictions beyond existing state regulations are proposed. **EDIT** **Original** A snowmobile trail traverses through the southern part of the Project Area (Figure 10) and much of the state land in the area is used for hunting; however, no parks or other recreational resources are present in the Project Area. **Modified**

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						A snowmobile trail traverses through the southern part of the Project Area (Figure 10) and much of the state land in the area is used for hunting; however, no parks or other recreational resources are present in the Project Area. Public access to the active Project Area would be restricted year-round for safety reasons, precluding hunting within the mine site. No additional seasonal restrictions beyond existing state hunting regulations are proposed. Hunting opportunities on adjacent public lands would remain available subject to Minnesota Department of Natural Resources regulations. [R3_Cmt_#1475]
1476	10.a.i	2532		It is recommended to include recreation and Big Sandy Lake as part of Land use as it is only 8 miles from the Project site.	Modify EAW to address comment.	Thank for the comment. The environmental assessment worksheet has been modified as follows: **EDIT** **Original** 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] **Modified** Savanna State Portage Park, located approximately 7 miles northwest 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. Big Sandy Lake, located approximately 8 miles northwest of the Project Area, is also a recreational resource known for boating, fishing, and other public recreational activities. [R3_Cmt_#1476] 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]
1477	10.a.i	2534		RGU notes the Draft Scoping Decision will likely include recognition of Native American retained rights (e.g., usufructuary rights) as a component of evaluating project impacts to land use. While the EAW does address wild rice resources in other EAW items, the Draft Scoping Decision will also likely identify the importance of manoomin (wild rice) resources within the affected watershed. The Draft Scoping Decision will also likely recognize the project's proximity to Sandy Lake, which is a known unique and significant cultural site, for potential project impacts to tangible and intangible resources.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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1478	10.a.i	2534		RGU notes the Draft Scoping Decision will likely include recognition of Native American retained rights (e.g., usufructuary rights) as a component of evaluating project impacts to traditional uses, including hunting, fishing, and gathering. While the EAW does address wildlife and plant resources in other EAW items, the Draft Scoping Decision will also likely identify the importance of traditional hunted, fished, and gathered resources within the affected area, including wild rice.	Modify EAW to address comment.	Thank you for the comment. The EAW acknowledges Native American retained rights to hunt, fish, and gather. We understand that the Draft Scoping Decision will consider these traditional uses, including resources such as wild rice, in the evaluation of potential project impacts.
1479	10.a.iii	2573		Please refer page 83 of the Aitkin County shoreland ordinance for information on Aitkin County shoreland district and overlay information for development. Please, indicate whether the project area does not have any shoreland districts or overlays within the boundary.	Modify EAW to address comment.	Thank you for the comment. The Aitkin County Shoreland Management Ordinance defines shoreland areas based on proximity to public waters. Review of publicly available data indicates that the Project Area is not located within a designated shoreland area as defined by the ordinance. **EDIT** **Added Language** The Project Area is not located within a designated shoreland area as defined by the Aitkin County Shoreland Management Ordinance. [R3_Cmt_#1479]
1480	10.a.iv	2593		Identify non-critical Project facilities that may be developed in FEMA delineated floodplains.	Modify EAW to address comment.	Thank you for the comment. No non-critical Project facilities are proposed to be developed within FEMA-delineated floodplains. The Project layout has been designed to avoid placing infrastructure, whether critical or non-critical, in areas mapped as floodplain.
1481	10.a.iv	2593		Commenter notes that EPA EJ Screening documents classify the Project Area as having high flood risk climate indicators both as compared to other areas of Minnesota and as compared with the US as a whole. Please consider the comment and adjust the text if appropriate. RGU notes Draft Scoping Decision may identify the EPA document as data to be considered in the EIS analysis.	Modify EAW to address comment.	Thank you for the comment. Talon was unable to access the EPA EJ Screening tools or the referenced documents. It would be helpful if the RGU could provide the specific EPA screening documents referenced.
1482	10.a.iv	2596		The site of the proposed facility may have not been impacted by the June 2012 500-year event, but the Water Treatment Plant discharge may be impacted by future flood events, restricting the facility's operations.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1483	10.c	2609		Please clarify. Stating that "...a conditional or interim use permit from Aitkin County" implies that a permit needed. This would mean that the project is not compatible with current Aitkin County zoning. If it were, no conditional or interim use permit would be needed. It would be considered a permitted use. Please, clarify if communications have occurred with the County to upfront secure this conditional or interim use permit. Whatever permit/approval is needed, please add it to Table 9.1.	Consider comment; modify EAW as warranted.	Under Aitkin County's Mining and Reclamation Ordinance, a Conditional Use Permit (CUP) is required for mining activities that do not qualify for a standard permit or exemption. Activities requiring a CUP include, but are not limited to, mining, crushing, screening, washing, refining, or processing of nonmetallic minerals such as sand, gravel, rock, topsoil, peat, and soil. The CUP is issued by the Aitkin County Planning Commission for a specified period, after which permit renewal is required. Based on this requirement, a Conditional Use Permit would be needed for the proposed project. Preliminary communications with Aitkin County Planning and Zoning staff

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						have occurred to discuss permitting requirements, but the formal CUP application process will proceed in coordination with the project timeline. The need for a Conditional Use Permit from Aitkin County will be added to Table 9.1 of the Environmental Assessment Worksheet (EAW) to reflect this requirement. [R3_Cmt_#1483]
1484	11.a	2649		The text describes the CGO and FGO rock units as "Coarse Grained Orthocumulate" and "Fine Grained Orthocumulate". Talon's Mine Materials Characterization Program documents originally used this terminology before renaming the rock units to "Coarse Grained Orthocumulate Olivine" and "Fine Grained Orthocumulate Olivine" which is consistent with the terminology in the NI 43-101 technical report of the project. Further the MZNO is referred to as "Mixed Zone Olivine". ER & Regulatory Guidance: Moving forward it will be important to maintain nomenclature consistency among all Tamarack project documents to avoid confusion of the subject matter and to accurately portray the geology nomenclature which implies geologic formation settings and has implications for general rock reactivity. The EIS scoping documentation provides an opportunity to begin standardizing nomenclature that will be part of the regulatory documentation as well.	Modify EAW to address comment.	Thank you for the comment. Talon is committed to maintaining consistent nomenclature across project documents moving forward to support clarity in regulatory documentation.
1485	11.a	2662		"semi-massive sulfide (SMSU) unit" should say "semi-massive sulfide unit (SMSU)"	Modify EAW to address comment.	Thank you for the comment. Talon will correct the text to read "semi-massive sulfide unit (SMSU)" for consistency. [R3_Cmt_#1485]
1486	11.a	2665	Graphic 11.1	Scoping EAW at Line 2652 says "The MZNO is typically found between the FGO and CGO", but Graphic 11.1 does not show this.	Modify EAW to address comment.	Thank you for the comment. The text in Section 11.2 describes the geologic relationship of the MZNO between the FGO and CGO. Graphic 11.1 is intended as a general conceptual sketch of the intrusive body and is not drawn to illustrate detailed stratigraphic relationships. A more detailed geologic cross-section may be developed as part of the Environmental Impact Statement (EIS).
1487	11.a	2665	Graphic 11.1	Graphic 11.1 doesn't relate the cross-sectional representation to Figure 12.	Modify EAW to address comment.	Thank you for the comment. Graphic 11.1 is intended as a conceptual cross-sectional sketch illustrating the general geologic relationships of the intrusive body. It is not drawn or tied directly to Figure 12. A more detailed integration of geologic cross-sections with surface project layouts may be provided during the Environmental Impact Statement (EIS) process.
1488	11.b	2682		EAW states that 85% of project area has "very low relief with a nearly level 0-3% slope" within the former lake plain of Glacial Lake Aitkin. RGU notes that a likely issue identified in the Scoping EAW is the needs to address how flatness of the area can affect flooding, including possibility of reversal of water flow direction.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1489	11.b	2694	Table 11.1	Table 11.1 indicates that nearly two-thirds of the project site has hydric soils, yet Section 11.6 states that peat or muck soils would be avoided to the extent possible. RGU notes importance for EIS accurately portray the extent of the project site that will impact wetlands, especially in context of the extremely low topography of the project site and the adjacent connected wetland complexes.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details. The column heading in Table 11.1 needs changed from 'Percent of Project Site' to 'Percent of Project Area'
1490	11.b	2696		RGU notes the Draft Scoping Decision will likely identify need to fully assess potential disturbance to peat/muck soils. Do the estimates in Table 11.2 include peat/muck soils that would be removed? Although may be discussed in Item 6b, there is value for the submittal to restate what will happen to the materials disturbed in Table 11.2.	Answer questions; modify text as warranted.	Thank you for the comment. The volumes in table does include peak and muck soils.
1491	11.b	2704		Rail spur "would be built on peat or muck soils". If known, are there any conceptual remediation plans at this time for reclamation and closure of the rail spur?	Answer question.	Thank you for the comment. Reclamation and closure planning for the rail spur, including conceptual approaches related to areas underlain by peat or muck soils, will be developed through the Environmental Impact Statement (EIS) and permitting process.
1492	12.a.i	2723		RGU notes the Draft Scoping Decision will likely require the EIS to include MPCA classifications (per MN Rules Chapter 7050 - water quality standards and designated uses) as well as DNR classifications for waters defined as within the vicinity of the project site. While the submittal references wild rice waters listed in the DNR inventory, the MPCA's list of wild rice waters (and the WQS for which project discharges and impacts must comply with) is both relevant and more extensive. The EIS will likely need to assess whether there are additional wild rice waters within the potentially affected and hydrologically connected (i.e., Tamarack River, Prairie River, Lake Minnewawa, Sandy Flowage). Issues in the EIS will likely include analysis of hydrologic impacts of mine construction and dewatering on the hydrologic conditions of wild rice waters downstream of the project site. While the submittal focuses on a one-mile radius from the project, the EIS will likely determine the appropriate criteria to determine potential hydrologic disruption to wild rice waters, which are exceptionally sensitive to hydrologic change.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1493	12.a.i	2723		RGU notes that Draft Scoping Decision will likely identify analysis of effect of project-related discharge on water levels of wild rice waters as an issue to investigate in the EIS.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1494	12.a.i	2737		The submittal does not include MPCA's designated water use classifications; these should be provided in a new paragraph for the public waters identified in Table 12.2. In other words the submittal should include the Class 2 waters designations. RGU notes the EIS will likely more formally describe the receiving water at that site as "perennial drainage ditch" or "canal/ditch," both of which are accepted naming conventions.	Modify EAW to address comment.	Thank you for the comment. **EDIT** **Language Added** Each of the public waters identified in Table 12.2 is subject to MPCA's designated beneficial use classifications under MN Rule Chapter 7050. These include Class 2 waters, which are

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						protected for aquatic life and recreation. The specific classification for each waterbody will be confirmed in the EIS. [R3_Cmt_#1494]
1495	12.a.i	2747		The MPCA maintains a list of waters used for production of wild rice. Please consult this list as there are other wild rice waters that may also be impacted by the proposed mine.	Consider comment; modify EAW as warranted.	Thank you for the comment. The text of the EAW has been updated accordingly.
1496	12.a.i	2751		The Draft Scoping Decision will likely identify the Tribal lands potentially impacted by the proposed project; potential land classifications include: reservation; fee; and trust. This could include lands in the vicinity of Big Sandy Lake and Lake Minnewawa.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1497	12.a.i	2759	Table 12.1	Table 12-1 in the submittal includes HUC 12 - Mud Lake and HUC 12 - Tamarack River, plus Big Sandy Lake. Why is HUC 12 - Lake Minnewawa excluded from the list, which would add Lake Minnewawa and Horseshoe Lake to the table? One reason for including at least these two lakes is because they are also on the 303(d) List of Impaired Waters. Because water impairments are a specific area of interest, consideration should be given to creating a single table that includes both public waters basins and watercourses and any applicable 303(d) impairments.	Answer question; modify text as warranted.	Thank you for the comment. The EAW focused on public waters and 303(d) impairments associated with the HUC12 watersheds that intersect the Project Area, specifically the Tamarack River and Mud Lake watersheds.
1498	12.a.i	2771	Figure 17	Why does HUC 10 watershed divide appear so prominent on this figure 17? The EAW talks about HUC12 #070101030603 and #070101030504, but #070101305 and #0701010306 are in large font.	Answer question; modify text as warranted.	Thank you for the comment. The watershed names and boundaries shown in Figure 17 are provided for general regional context. While the EAW focuses on the HUC12 watershed level for impact evaluation, the inclusion of the HUC10 watershed names and divides in the figure helps illustrate the broader hydrologic setting of the Project Area.
1499	12.a.i	2787		In addition to PWI listings, the submittal should also include MPCA use classifications if they are applicable (i.e., impaired waters, beneficial use).	Modify EAW to address comment.	Please see the response to comment 1494.
1500	12.a.i	2790		The EAW appears to correctly identify there are no ORVWs within the two HUC 12 watersheds but does indicate the Mississippi River is an ORVW. RGU notes that the Draft Scoping Decision will likely identify the need to assess potential impacts to use and value of waters including in terms of protecting Tribal treaty-reserved rights.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1501	12.a.i	2819	Figure 18	Should this reference Figure 18 vs Figure 17?	Consider comment; modify EAW as warranted.	Thank you for the comment. The figure reference has been updated. **EDIT**

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						Original Floodplains have been delineated by the Federal Emergency Management Agency (FEMA) for several areas and resources within the Big Sandy Lake watershed, including the Tamarack River, Prairie River, and Sandy River, as well as several lakes (Figure 17). **Modified** Floodplains have been delineated by the Federal Emergency Management Agency (FEMA) for several areas and resources within the Big Sandy Lake watershed, including the Tamarack River, Prairie River, and Sandy River, as well as several lakes (Figure 18).
1502	12.a.i	2819		RGU notes the Draft Scoping Decision will likely require assessment of project-related flooding potentials to consider climate change variables, especially as a function of stormwater volumes and WWTF discharge. see comments for Table 7.1 and Figure 18.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1503	12.a.i	2834		Delineation report submitted to DNR was DRAFT. Revise text.	Modify EAW to address comment.	The delineation report submitted to RGU, in December 2024, was the final version. No further revision to the EAW text is needed.
1504	12.a.i	2834		Include information on how project area was determined for wetland delineation. Project area needs to be large enough to determine if indirect wetland impacts would occur.	Modify EAW to address comment.	Thank you for the comment. The area selected for wetland delineation was based on the anticipated limits of construction and associated infrastructure, informed by preliminary engineering and design data available at the time of fieldwork. The delineated area was intended to capture potential direct and proximate indirect wetland impacts.
1505	12.a.i	2837		The USACE is not an official member of the technical evaluation panel which consists of LGU, SWCD, BWSR, and in some cases DNR. In this case, DNR is "approving authority". Revise text.	Modify EAW to address comment.	Thank you for the comment. **EDIT** **Original** 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] **Modified** This delineation report was submitted to the agencies on July 17, 2023, and is pending review by the Technical Evaluation Panel (TEP), which includes representatives from the Local Government Unit (Aitkin County), the Soil and Water Conservation District (SWCD), the Board of Water and Soil Resources (BWSR), and the Minnesota Department of Natural Resources (DNR). The U.S. Army Corps of Engineers (USACE) will provide separate concurrence on the delineation for purposes of federal permitting. [R3_Cmt_#1505]

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1506	12.a.i	2838		There appears to be a duplicated sentence fragment in line 2838.	Modify EAW to address comment.	Thank you for the comment. The text of the EAW was edited accordingly.
1507	12.a.i	2841		Clarify the acreage of those wetlands that Talon considers to be peatlands. Also please clarify any maps with which wetlands are considered peatlands.	Modify EAW to address comment.	Thank you for the comment. Peat-forming wetlands are generally associated with conditions that support the accumulation of organic soils, such as those found in bogs, fens, and some forested wetlands. The Environmental Impact Statement (EIS) data submittal will include further evaluation of wetland types, including identification of those underlain by peat.
1508	12.a.i	2847		Please, provide a brief statement on how groundwater and surface water monitoring will be used to define the existing water budget of wetlands and the risk of water budget changes with the proposed mining activities.	Modify EAW to address comment.	Thank you for the question. This will be addressed in the EIS data submittal.
1509	12.a.i	2853		It would be helpful to have a figure showing the monitoring locations for surface water, wetlands, and groundwater.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1510	12.a.ii	2876		This section and/or Figure 6 should note that not all wells are included in the MWI. Consideration should be given to conducting a comprehensive door-to-door search of wells within the likely zone of influence of the mine should be completed.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1511	12.a.ii	2876		Consideration of collecting baseline WQ and water level data for the 32 water supply wells within one mile of the project area should be done to inform the development of a conceptual ground water model.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1512	12.a.ii	2876		RGU notes the Draft Scoping Decision will likely include potential water quality impacts on domestic water supply wells, including several wells immediately adjacent to the proposed project boundary. This may require baseline testing of water quality parameters in project area wells.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1513	12.a.ii	2879		Edit the second half of the sentence to read, "... public supply/non-community nontransient wells (2 wells)...".	Modify EAW to address comment.	Thank you for the comment. No wells classified as public supply/non-community nontransient were identified in the Minnesota Well Index data. The original classification of "...public supply/non-community wells (2 wells)..." aligns with the available information and has been retained.
1514	12.a.ii	2886		With depth to water being so shallow, any work on the site can drastically alter the water's behavior.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1515	12.a.ii	2892		Please, add a statement on how groundwater flowing near the mine will be monitored for potential water quality changes (e.g. due to changing redox conditions). Please, add a statement on how modeling will be used to understand the fate and transport of groundwater with altered quality.	Modify EAW to address comment.	**EDIT** **Add Language** In the EIS data submission, groundwater and geochemical modeling will be employed to evaluate the potential for changes in water quality to migrate within the subsurface environment. The modeling framework will be used to simulate the flow of groundwater and assess the fate and transport of chemical constituents under varying hydrogeologic and geochemical conditions. During operations, groundwater in proximity to the mine would be monitored through a network of wells located near the underground workings and surface infrastructure. The specific design of the groundwater monitoring program, including well locations, frequency, and analytes, would be developed through the permitting process.
1516	12.b.i.1	2925		Acknowledging this is not known at this time, the capacity of a publicly owned treatment facility to treat the project's wastewater (i.e., toilet waste) should be identified early in the process in case the project layout requires capacity for on-site treatment if needed.	Answer question.	Thank you for the comment. No changes to the EAW are proposed at this time.
1517	12.b.i.3	2952		Water volume/flow should be expressed in consistent units throughout the EAW.	Consider comment; modify EAW as warranted.	Thank you for the comment. The EAW will be reviewed for unit consistency.
1518	12.b.i.3	2970		A table or graph showing the mine inflow and projected discharge rates from the Contact Water Treatment Plant would be helpful.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1519	12.b.i.3	2970		RGU notes the Draft Scoping Decision will likely include identification of any faults, fractures, and other mine conditions on which the preliminary inflow of 800 gpm, with a conservative range of 800-1,600 gpm was calculated. The submittal would benefit from some detail any grouting or other methods that the Talon suggests may reduce inflow.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1520	12.b.i.3	2993		Please specify the "impervious surface" and collection system that would be used within the Ore Transfer Building.	Modify EAW to address comment.	Thank you for the comment. Once the site for the Ore Transfer Building has been levelled, "the foundations would be

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						excavated, concrete poured, and the concrete slab on grade would be constructed after compaction of the sub-base." Specific details regarding the surface materials and collection system would be developed and refined during the Environmental Impact Statement (EIS) preparation and final engineering design phases. These details would be subject to applicable state permitting requirements, including the National Pollutant Discharge Elimination System (NPDES) permitting process administered by the Minnesota Pollution Control Agency.
1521	12.b.i.3	2995		Confirm that "MDH,2022" is the correct reference used to estimate flow.	Answer question; modify text as warranted.	Thank you for the comment. The EWA has been edited accordingly. **EDIT** **Original** The channel-forming flow at LV-006 was estimated using the United States Geological Service's (USGS) StreamStats tool to be approximately 13,500 gpm (51,100 L/min) (MDH, 2022). **Modified** The channel-forming flow at LV-006 was estimated using the United States Geological Service's (USGS) StreamStats tool to be approximately 13,500 gpm (51,100 L/min) (USGS, 2022B).
1522	12.b.i.3	3007		Changes to water quality in peatlands can have significant, ecosystem altering impacts on peatland plant communities. Please, generally discuss how the project will ensure compatibility of discharge water with peatland water that may have seasonally varying water chemistry.	Modify EAW to address comment.	Thank you for the comments. These factors will also be further addressed in the EIS data submittal.
1523	12.b.i.3	3007		Please, generally discuss expected impacts that increased flow in the ditch network may have on peatland water tables near the ditch. Peatland ditches are different from natural streams and the evidence cited to suggest the ditch can accommodate the increased flow from project discharge seems to discuss natural stream channels.	Modify EAW to address comment.	Thank you for the comments. These factors will also be further addressed in the EIS data submittal.
1524	12.b.i.3	3007		Please briefly state that interaction between treated water discharged to ditches and shallow groundwater in wetlands should be studied to understand potential impacts on wetland hydroperiod and water quality.	Modify EAW to address comment.	Thank you for the comments. These factors will also be further addressed in the EIS data submittal.
1525	12.b.i.3	3007		Please state that a hydraulic analysis will be completed to confirm the capacity of ditches to convey discharges of treated water and remain stable. Please, be aware that the channel forming discharge concept used here is poorly suited to ditches.	Modify EAW to address comment.	Thank you for the comments. These factors will also be further addressed in the EIS data submittal.

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1526	12.b.i.3	3013		EAW states that "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)". Please, clarify how are smaller storms changing and/or expected to change. Also, please state how much of the 20% "allowance" could be consumed by changes to the channel forming event. This information is not provided in 7.0 Climate Adaptation and Resilience.	Modify EAW to address comment.	Thank you for the comment. The statement regarding a stream's adaptability to a 20% increase in channel-forming flow is a general observation. An evaluation on channel-forming flow will be addressed in the EIS, along with hydrologic modeling to assess potential stream response. Regulatory permitting processes will further ensure that discharge volumes and flow conditions remain protective of downstream resources.
1527	12.b.i.3	3020		Please consider that in addition to NPDES/SDS permit for future "flow" conditions, it is important to consider the increase in volume being discharged to the resources which could cause instabilities in the stream system and adjacent wetlands.	Modify EAW to address comment.	Thank you for the comment. Potential effects related to increased discharge volume, including stream stability and wetland response, will be further evaluated in the EIS. Long-term management of flow and volume will be subject to regulatory oversight through the NPDES/SDS and water appropriations permitting processes.
1528	12.b.i.3	3026		EAW states that "The potential effect of discharges on water quality in receiving and downstream waters and surface water-groundwater interactions would be evaluated in the EIS." Please include a statement about how those interactions will be evaluated.	Modify EAW to address comment.	Thank you for the comment. The EAW identifies that surface water–groundwater interactions will be evaluated in the EIS. The methodology for this evaluation will be described in the EIS data submittal.
1529	12.b.i.3	3030		Does the "Climate Adaption and Resilience section" intend to refer to the Climate Adaptation and Resilience, section 7.0 of the EAW?	Answer question; modify text as warranted.	Thank you for the inquiry. The EAW has been modified as follows: **EDIT** **Original** "...the Climate Adaption and Resilience section..." **Modified** "...Section 7.0 Climate Adaption and Resilience..." [R3_Cmt_#1529]
1530	12.b.i.3	3035		Please include additional detail to the statement "Depending on the duration of discharge after operations...". Is there a preliminary estimate of duration? This would help to understand the potential timeframe for impacts.	Modify EAW to address comment.	Thank you for the comment. Additional detail regarding the duration of discharge following operations will be provided in the EIS data submittal and/or during the permitting process. No changes to the EAW are proposed at this time.
1531	12.b.i.3	3037		The statement seems to be referring to current conditions, not to mid-century projections which should be the approach for EAW 12.b.i.3. Please, clarify.	Modify EAW to address comment.	Thank you for the comment. The existing text in the EAW is focused on the timeframe during which the Project would be operational, which is when peak discharge would occur. As stated, the qualitative review reflects anticipated climate trends relevant to that period. Additional quantitative analysis of longer-term climate projections, including mid-century scenarios, will be provided in the EIS.
1532	12.b.i.3	3037		The duration of an NPDES permit has no relationship to the duration over which climate effects on mine operations and closure must be evaluated in environmental review.	Consider comment; modify EAW as warranted.	Thank you for the comment. The reference to the five-year NPDES/SDS permit cycle was not intended to define the timeframe over which climate effects on mine operations and closure will be evaluated. Rather, it was included to acknowledge that permit conditions may adapt over time as site conditions and regulatory requirements evolve. A more detailed evaluation of how climate trends could influence

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						water resources during and after operations will be included in the EIS data submittal.
1533	12	3059		How will the increase in storm event intensity be accounted for? Due to the large amount of impervious surface added by this proposed project, there will be a larger volume and peak discharge rate of stormwater runoff post construction. In addition to constructing stormwater treatment ponds to meet construction stormwater permit requirements, the MPCA suggests that any stormwater treatment ponds be designed so that the post-project peak discharge rates for the 2,10 and 100-yr storm events are equal to, or lower than the pre-project peak discharge rates for those storm events. This will help to protect the receiving channel from erosion cause by peak flows that exceed current conditions. The most protective design when considering the impacts of climate change and the fact that Minnesota is seeing more frequent and intense rain events should use the upper end of the 90% confidence interval in Atlas 14 to determine the size of storm events when sizing stormwater ponds on site. This applies to all mentions of stormwater ponds throughout the EAW.	Answer question; modify text as warranted.	Thank you for the comment. The details regarding how the Project would maintain or manage runoff discharge rates for various storm events will be provided as part of the EIS data submittal.
1534	12	3059		It is unclear how much stormwater drainage from the project will be discharged to the same channel as the treated contact water - please provide detail	Modify EAW to address comment.	Thank you for the comment. The specific design and discharge routing for stormwater and treated contact water will be further developed through the permitting process. At this stage, the EAW reflects the conceptual separation of clean stormwater and contact water systems. Additional detail on discharge volumes, flow paths, and receiving channels will be provided in the EIS and through the NPDES/SDS permitting documentation.
1535	12	3067		Not enough information to provide comment. Please provide more information including specific BMPs and a discussion of temporary sediment ponds during construction and project phasing considerations to reduce the discharge of sediment laden waters during construction	Modify EAW to address comment.	Thank you for the comment. Additional detail on construction-phase stormwater management, including specific best management practices (BMPs), would be developed as part of the Stormwater Pollution Prevention Plan (SWPPP), which is required for permitting under the Construction Stormwater General Permit (CSWGP). Temporary sediment basins and other BMPs (e.g., silt fences, erosion control blankets, stabilized construction entrances) would be implemented and adapted to specific phases of construction to minimize discharge of sediment-laden water.
1536	12.b.ii	3072		Regulatory Guidance. Note that the Minnesota Construction Stormwater General Permit does not require the "treatment" of a volume of water equivalent to 1-inch (2.54 cm), it requires complete retention of that volume of runoff unless prohibited by any of items 16.14 through 16.21 of the permit. Please clarify in text.	Modify EAW to address comment.	Thank you for the comment. The language in the EAW reflects the requirements of the Minnesota Construction Stormwater General Permit, Section 15.1 – Permanent Stormwater Treatment System [Minn. R. 7090], regarding the design and construction of a permanent stormwater treatment system. No changes to the EAW are proposed at this time.
1537	12.b.ii	3091		Provide pre- and post-construction watersheds to wetlands where changes in stormwater discharges would occur.	Advisory. Future discussion topic for development of Draft	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1538	12.b.ii	3091		The EAW states, "the majority of stormwater from the Project would be discharged generally northward from the Project Area to either wetlands or ditches and then follow the north ditch network to the Tamarack River." Please identify those waterbodies (i.e., wetlands and creeks) where wastewater is proposed to be discharged.	Modify EAW to address comment.	Thank you for the comment. The EAW identifies that stormwater from the Project would discharge to the nearby by unnamed wetlands and/or ditches located within the Headwaters to Big Sandy Lake and Big Sandy Lake Outlet watersheds. No changes to the EAW are proposed at this time.
1539	12.b.ii	3102		EAW states that "Stormwater from pervious natural, stabilized, and reclaimed surfaces would not be actively managed and would continue to follow natural drainage pathways." This should be modified to say "natural existing drainage pathways" to ensure that the hydrology to downstream wetlands and waterbodies is maintained post-project. Please, correct.	Modify EAW to address comment.	Thank you for the comment. The EAW text regarding drainage from pervious natural, stabilized, and reclaimed surfaces is intended to convey that existing hydrology would be maintained. To avoid confusion and emphasize this intent, the text has been revised to state “natural existing drainage pathways.” **EDIT** **Original** Stormwater from pervious natural, stabilized, and reclaimed surfaces would not be actively managed and would continue to follow natural drainage pathways. **Modified** Stormwater from pervious natural, stabilized, and reclaimed surfaces would not be actively managed and would continue to follow natural existing drainage pathways.[R3_Cmt_#1539]
1540	12.b.ii	3106		RGU notes that given that mid-century projections cover the 2040-2060 time period and this project still needs to go through the permitting process before it can start, it is possible the Draft Scoping Decision will consider the lifespan of the project to overlap with the conditions we expect to see in the future. As a result, mid-century climate projections should be used as a base in this review process.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1541	12.b.ii	3106		These conclusions are based on a "qualitative" review and therefore do not constitute proof and can be misleading. Please, eliminate the sentence "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 Item reply to Section 12.b.i.3 ,.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."	Consider comment; modify EAW as warranted.	Thank you for the comment. The sentence in question reflects a high-level, qualitative summary consistent with available regional climate modeling.
1542	12	3134		Dewatering discharges under the construction stormwater permit must follow items 10.1 through 10.6 which includes photographing the discharge at the beginning and at least once every 24 hours of operation.	Advisory. Future discussion topic for development of Draft	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1543	12.b.iii	3138		What does it mean "to solidify areas" as used in the sentence?	Answer question; modify text as warranted.	Thank you for the comment. The phrase “to solidify areas” is used in the context of temporarily removing groundwater to improve subsurface conditions for construction, as described in the same sentence. Specifically, the paragraph explains that groundwater would be temporarily removed “to dry and solidify areas” to facilitate the construction of surface facilities and the cement bentonite (CB) cell for the Decline Ramp. This language reflects common construction practice, where removing moisture from saturated soils allows the material to stabilize and support structural development. As the purpose and mechanism are clearly stated in the existing text, no further revision is necessary.
1544	12.b.iii	3195		RGU notes the Draft Scoping Decision will likely identify the need to consider potential drought years and effects to groundwater in water balance studies for the EIS. Consideration of contingency planning around potential drought years may make sense to pursue.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1545	12.b.iv.a	3198		The text would benefit with some description of efforts made to minimize wetland impacts, which could include BMPs that would be employed.	Modify EAW to address comment.	Thank you for the comment. The following edit was made to the EAW. **EDIT** **Original** The Project would use underground mining techniques, which minimize impacts to wetlands compared to surface mining. Surface facilities to support underground mining are being designed to avoid wetlands to the extent practicable. However, some direct impacts to wetlands would occur in parts of the Project Area where ground disturbance is proposed and wetlands are unavoidable. **Modified** The Project would use underground mining techniques, which minimize impacts to wetlands compared to surface mining. Surface facilities to support underground mining are being designed to avoid wetlands to the extent practicable. The Project Area was designed to minimize wetland impacts by aligning surface infrastructure within previously disturbed areas and upland zones where possible. Wetland avoidance was prioritized during site layout, particularly in areas containing deep marsh, open bogs, or interconnected wetland complexes. While some overlap with wetlands remains unavoidable due to the extent and distribution of wetland resources within the landscape, the configuration of the Project Area reflects a deliberate effort to limit encroachment and reduce the potential for direct impacts.

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						[R3_Cmt_1545] However, some direct impacts to wetlands would occur in parts of the Project Area where ground disturbance is proposed and wetlands are unavoidable.
1546	12.b.iv.a	3198		The text would benefit with some description of available wetland bank credits; it is recognized this can change and will be formalized as part of the permitting process.	Modify EAW to address comment.	Thank you for the comment. The availability and use of wetland bank credits will be evaluated and formalized through the permitting process. No changes to the EAW are proposed at this time.
1547	12.b.iv.a	3208		The submittal acknowledges the potential for direct and indirect effects, including impacts to peatland hydrology. There are impacts to peatland hydrology that can already be projected based on the literature without full study in an EIS, these can include: fill material could block water flow; culverts potentially creating preferential flow paths, pooling on the upgradient side of the railway spur and erosion near the culvert and downgradient side. RGU notes the Draft Scoping Decision will likely include detailed analysis of the rail spur's potential impacts during construction and operations to wetlands, especially peatland resources, to support the EIS analysis.	Advisory. To be covered in EIS.	Thank you for your comment. This topic may be considered by the Responsible Governmental Unit (RGU) as part of the Environmental Impact Statement (EIS) process.
1548	12.b.iv.a	3214		WCA rules define temporary wetland impacts as 6 months or less. Please include discussion of regulatory definition in revised text.	Modify EAW to address comment.	Thank you for the comment. The definition of temporary wetland impact under the Wetland Conservation Act (WCA) is addressed in MN Rule Chapter 8420.0415, Subpart H. Interpretation and application of this definition will be addressed during the permitting process.
1549	12.b.iv.a	3216		The submittal should include a brief discussion of potential impacts to mercury cycling as indirect wetland impacts. This is because altered hydrology can affect mercury fate and transport in peatlands. RGU notes Draft Scoping Decision will likely include detailed assessment of this issue for EIS analysis.	Modify EAW to address comment.	Thank you for the comment. The EAW identifies the potential for indirect wetland impacts due to altered hydrology and notes that additional analysis will be conducted in the EIS. This includes evaluations of potential hydrologic changes to wetland systems that may affect water quality. The potential influence on mercury cycling in peatland systems may be considered as part of this analysis. No changes to the EAW are proposed at this time.
1550	12.b.iv.a	3216		Indirect wetland impacts may be substantial due to mine dewatering.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1551	12.b.iv.a	3218		Atmospheric deposition from dust or other air emissions should evaluated for water quality; text as written implies wetland area as opposed to water quality.	Modify EAW to address comment.	Thank you for the comment. The EAW has been edited as follows: **EDIT** **Original** In addition to direct wetland impacts, there is a potential for the Project to result in indirect wetland impacts. Indirect wetland impacts could occur from wetland fragmentation, changes in wetland hydrology, and atmospheric deposition from dust or other air emissions. Potential indirect wetland

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						impacts and proposed monitoring would be further analyzed as part of surface, groundwater, and wetland studies being completed to support the EIS. **Modified** In addition to direct wetland impacts, there is a potential for the Project to result in indirect wetland impacts. Indirect wetland impacts could occur from wetland fragmentation, changes in wetland hydrology, and atmospheric deposition from dust or other air emissions, which may affect water quality.[R3_Cmt_#1551] Potential indirect wetland impacts and proposed monitoring would be further analyzed as part of surface, groundwater, and wetland studies being completed to support the EIS.
1552	12.b.iv.a	3221	Table 9.1	The submittal should identify the need to confirm legal status of onsite ditches as well as assessment of potential impacts. Legal abandonment proceedings through the Public Drainage Authority may be needed for any Public Ditches. If indeed Public Ditches are present, then a potential ditch abandonment process should be identified in Table 9.1 as a possible approval. Depending on the answer, RGU notes this may be an issue identified for assessment in the Draft Scoping Decision.	Modify EAW to address comment.	Thank you for the comment. Talon is not proposing the abandonment of any existing public ditches within the Project Area. The legal status of on-site ditches will be confirmed, as appropriate, during the permitting phase in coordination with relevant authorities. No changes to Table 9.1 are proposed at this time.
1553	12.b.iv.a	3221		Why is there expressed uncertainty about the need for a USACE 404 permit, DNR WCA permit, and MPCA 401 certification?	Answer question; modify text as warranted.	See the response to comment 1554.
1554	12.b.iv.a	3221		Please revise text to indicate that impacts to wetlands "would" require a permit, rather than "could require a permit..."	Modify EAW to address comment.	Thank you for the comment. The EAW will be revised to state that the identified wetland impacts would require applicable federal and state permits. **EDIT** **Original** Impacts to wetlands could require a permit from the United States Army Corps of Engineers under Section 404 of the Clean Water Act and from the DNR under the requirements of Minnesota's Wetland Conservation Act (WCA). **Modified** Impacts to wetlands would require a permit from the United States Army Corps of Engineers under Section 404 of the Clean Water Act and from the DNR under the requirements of Minnesota's Wetland Conservation Act (WCA).
1555	12.b.iv.b	3248		The submittal should include a brief discussion of potential impacts to mercury export to waters downstream of the project area. Several downstream waters are already impaired for mercury and potential changes in mercury export need to be considered. RGU notes Draft Scoping Decision will likely include detailed assessment of this issue for EIS analysis.	Modify EAW to address comment.	See the response to comment 1549.

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1556	13.a	3293		To the degree now known, are there any leach fields associated with the site's house and farmhouse, and if yes, this should be noted in the submittal. Again if yes, is there any preliminary assessment available of the extent and content (of the leach field(s)) as well as the direction of flow through surface water or shallow aquifers? This would likely be an issue identified in the Draft Scoping Decision for analysis in the EIS.	Answer question; modify text as warranted.	Thank you for the comment. The EAW data submittal includes a statement noting the presence of a septic system and/or leach fields associated with the house and farmhouse at the site. This information is included in the section describing existing site conditions to acknowledge past land use.
1557	13.a	3294		The Draft Scoping Decision will likely require identification of the location, volume, and chemistry of all buried drill cuttings and active or closed sumps cited at Line 3294 for the EIS assessment.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1558	13.b	3305		Please provide an explanation as to why waste rock is not considered a solid waste when it is proposed to be disposed of at a licensed landfill.	Modify EAW to address comment.	Thank you for the comment. Under Minn. R. 7035.0300, subp. 100, “solid waste” does not include earthen fill, boulders, or rock. Therefore, waste rock from mining is not classified as a solid waste, even when placed in a licensed landfill.
1559	13.b	3325		Please clarify whether some or all of the solid waste generated on site is expected to be disposed of in a regulated facility off-site.	Modify EAW to address comment.	Thank you for the comment. The EAW states that solid waste would be disposed of in accordance with federal, state, and local regulations. It also indicates that solid industrial waste would be taken off site by a third party for recycling when feasible or disposed of. Disposal at an off-site facility implies that the facility would be regulated consistent with applicable requirements.
1560	13.d	3398		Will hazardous materials used or stored for mining or exploration activities, such as lubricants, include any PFAS chemicals? Will the above answer depend upon whether a mobile tunnel boring process is used?	Answer question.	Thank you for the comment. Talon will review all chemical products proposed for use at the site, including lubricants and other substances, through their Safety Data Sheets to understand their chemical composition. If PFAS compounds are identified in a proposed product, Talon will make efforts to identify and select alternative products that do not contain PFAS, consistent with emerging regulatory expectations and environmental best practices.
1561	14.a	3432		The submittal notes the Project Area is dominated by open and coniferous bog, shrub-carr, and hardwood swamp wetland communities. RGU notes the Draft Scoping Decision will likely include analysis of climate change resiliency due to loss of carbon storage, including peatlands impacted by the project.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1562	14.a	3436		RGU notes the Draft Scoping Decision will likely require use of both DNR and MPCA wild rice water designations plus other information available over the course of the EIS. RGU notes the EIS will likely more formally describe any ditches in the Project Area as "perennial drainage ditch" or "canal/ditch," both of which are accepted naming conventions.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1563	14.b	3445		Information on endangered, threatened, and special concern species does not appear to be up to date. There is a known maternity roost tree for northern long-eared bats three miles west of the Project area. Please update this section	Modify EAW to address comment.	Thank you for the comment. Information on the known northern long-eared bat maternity roost tree located approximately three miles west of the Project Area is already included in the EAW, based on data provided by the Minnesota DNR in 2022. If more recent data becomes available, it will be reviewed and incorporated during the EIS process as appropriate.
1564	14.b	3457		RGU notes that the Draft Scoping Decision will likely provide guidance on the appropriate critical habitat analysis area. This may mean that critical habitat in close proximity to the Project site would be analyzed and included in the EIS.	Modify EAW to address comment.	Thank you for the comment. Talon acknowledges that the Draft Scoping Decision will likely provide guidance on the appropriate area of analysis for critical habitat.
1565	14.b	3459		The paragraph is using the incorrect reference (MDNR, 2022E). It appears that the Canada Lynx reference would be more appropriate.	Modify EAW to address comment.	Thank you for the comment. Talon will correct the reference.
1566	14.b	3463		This paragraph about the gray wolf uses a reference to information about Canada lynx. Please correct this.	Modify EAW to address comment.	Thank you for the comment. Talon will correct the reference.
1567	14.b	3467		NHIS observations of maternity roost trees for northern long-eared bats are not a census of roost trees on the landscape and it should not be ruled out that roost trees exist within the project area. It is recommended additional surveys be conducted within the project area to determine the presence of roost trees prior to any tree clearing.	Provide data as requested.	Thank you for the comment. Additional biological studies, including surveys for potential maternity roost trees, will be addressed as part of the EIS data submittal
1568	14.b	3497		Please edit the text to say "Wild rice (Zizania palustris) is a native plant found in area lakes and streams downstream of the Project Area...."	Modify EAW to address comment.	Thank you for the comment. The EAW was edited accordingly. **EDIT** **Original** Wild rice (Zizania palustris) is a native plant found in area lakes downstream of the Project Area and is of particular significance to the local and indigenous communities. **Modified** Wild rice (Zizania palustris) is a native plant found in area lakes and streams downstream of the Project Area and is of particular significance to the local and indigenous communities. [R3_Cmt_#1568]
1569	14.b	3500		RGU notes the Draft Scoping Decision will likely require a thorough analysis of potential impacts to wild rice.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1570	14.b	3511		Although no WMAs are within the project area proper, they are in close proximity (less than three miles away). RGU notes that Draft Scoping Decision will likely require assessment for potential indirect impacts (e.g., air; noise; hydrology; etc.) to local WMAs and assess accordingly for the EIS.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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1571	14.c	3525		Commenter notes that while project discharge may meet water quality standards, any potential mercury releases as well as potential for mercury methylation to occur should be assessed, including impacts to aquatic and terrestrial biota. The submittal should identify this as an issue at the appropriate location(s) in the document. RGU notes the Draft Scoping Decision will likely assessment of potential mercury and/or methylmercury impacts to aquatic and terrestrial biota due to project releases, including potential avoidance measures and mitigation.	Modify EAW to address comment.	Thank you for the comment. Talon recognizes that potential water quality impacts, including those related to mercury and methylmercury, are important considerations for the Environmental Impact Statement. As noted, the Draft Scoping Decision will likely provide guidance on the appropriate scope of analysis, including evaluation of potential effects on aquatic and terrestrial biota. These topics will be addressed during the EIS process, as appropriate.
1572	14.c	3530		RGU notes the Draft Scoping Decision will likely detail how climate adaptation and resilience should be addressed in the EIS.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1573	14.c	3536		Content of this section paraphrases Lines 3451-3479 without adding new information. Consider removing redundancies.	Modify EAW to address comment.	Thank you for the comment. The information provided in this section is intended to summarize and support the broader analysis in the Environmental Assessment Worksheet.
1574	14.c	3560		The submittal should recognize that project activity could introduce aquatic invasive species, plus changes in water quality and/or quality can result in invasive species impacts.	Modify EAW to address comment.	Thank you for the comment. The EAW has been edited accordingly. **EDIT** **Original** Invasive species are non-native species that cause or may cause economic or environmental harm or harm to human health; or threaten or may threaten natural resources or the use of natural resources in the state (Minnesota Statutes, 2022, section 84D.01, subdivision 9a). Vegetation clearing and the movement of construction equipment in and out of the Project Area could make it susceptible to the introduction and spread of invasive plant species. To minimize the spread of invasive species, contractors would be required to comply with applicable Minnesota regulations, which could include measures such as cleaning construction equipment prior to arriving on site and upon leaving the site (MDNR, 2022A) **Modified** Vegetation clearing and the movement of construction equipment in and out of the Project Area could make it susceptible to the introduction and spread of invasive plant species. In addition to the potential for terrestrial invasive species introduction, project activities may present a risk for the introduction of aquatic invasive species. [R3_Cmt_#1598] To minimize the spread of invasive species, contractors would be required to comply with applicable Minnesota regulations, which could include measures such as cleaning construction equipment prior to arriving on site and upon leaving the site.

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1575	14.d	3568		Requires a section heading to appear in the table of contents. Currently is grouped with "Invasive Species". Please change.	Modify EAW to address comment.	Thank you for the comment. Talon agrees with the suggested edit and will revise the section heading to appear separately in the table of contents.
1576	14.d	3576		EAW states "the site surface is primarily gravel." Is there a possibility of contaminants being introduced to shallow groundwater as gravel is not impervious.	Answer question; modify text as warranted.	Thank you for the comment. Activities would occur primarily within the enclosed Ore Transfer Building and underground mine. By containing operations within enclosed structures and underground workings, the potential for contaminants to be released to the environment and impact shallow groundwater is significantly reduced.
1577	14.d	3587		If the Project would operate 24 hours a day, seven days a week, 365 days of the year, how would wildlife be able to freely move throughout the site? Are there safety concerns or any estimates oof wildlife takings?	Answer questions; modify text as warranted.	Thank you for the comment. Although the Project would operate 24 hours a day, seven days a week, operations would be primarily confined to enclosed facilities and underground areas. Significant portions of the surrounding landscape would remain undeveloped, allowing wildlife to continue to move through and around the project area. While localized effects such as displacement or occasional interaction with vehicle traffic are possible, the overall risk of wildlife takings is anticipated to be low. Additional analysis of potential impacts to wildlife will be addressed in the Environmental Impact Statement (EIS).
1578	15	3596		Please include a summary of previous and ongoing tribal engagement with the project to help the reader understand scoping commitments and prior and ongoing interactions.	Modify EAW to address comment.	Thank you for the comment. A summary of tribal engagement is not a required component of this section of the Environmental Assessment Worksheet (EAW). Talon recognizes the importance of ongoing tribal consultation and is committed to ensuring that engagement is conducted respectfully and appropriately.
1579	15	3596		Please include a statement that the closest National Register property is Savanna Portage, located approximately 10 miles north of the project, for context.	Modify EAW to address comment.	Thank you for the comment. The requested information regarding the Savanna Portage Historic Trail will be added to the EAW as follows: **EDIT** **Added Language** The nearest listed National Register property is the Savanna Portage Historic Trail, located approximately 10 miles north of the Project Area, within Savanna Portage State Park. Given the distance and the nature of the Project, no direct or indirect effects on this property are anticipated. [R3_Cmt_#1579]

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1580	15	3596		RGU notes the Draft Scoping Decision will likely require assessment of how archaeological and cultural resources could be negatively affected and impacted by the project. This could include both direct impacts, such as the destruction of archaeological sites through dirt work, and indirect effects, such as increased noise, which could affect traditional uses of the area during ceremonies and other practices, as well as surface water runoff, particularly in relation to nearby wild rice stands. Talon can expect future engagement on this issue during the scoping process.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1581	15	3607		Please adjust the text to mention that, in addition to the wetland complex being a possible Tribal burial site, there are additional potential cultural impacts due to the location that should also be addressed.	Modify EAW to address comment.	Thank you for the comment. The text will be adjusted to acknowledge that, in addition to the potential for burial sites, there may be other cultural resources and traditional uses associated with the landscape. **EDIT** **Original** 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] It is important to acknowledge that the Native American nations played a vital role in Minnesota's history and continue to influence its culture today. 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] **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] It is important to acknowledge that the Native American nations played a vital role in Minnesota's history and continue to influence its culture today. Additionally, the wetland complex in the Project Area may have been used as burial sites, raising the possibility of inadvertent discoveries. Other potential cultural resources and traditional uses associated with the landscape may also be present. [R3_Cmt_#1582] This concern requires evaluation as part of the EIS process. [R2_Cmt_#646]
1582	15	3614		RGU notes that while SHPO data may be sufficient for the Scoping EAW, the EIS analysis will likely require more information that will be detailed in the Draft Scoping Decision. This will likely include regional THPOs to incorporate tribal knowledge of traditional and cultural resources in the impact analysis. The submittal correctly noted tribal consultation under Section 106 of the National Historic Preservation Act would be a requirement for the USACE Section 404 Permit.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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1583	15	3625	Table 15.1	Please add the area examined (e.g., 1 mile, 2 miles) in the table caption for clarity.	Modify EAW to address comment.	Thank you for the suggestion. The caption has been modified. **EDIT** **Original** Previously Identified Cultural Resources in Visual Proximity to the Project Area **Modified** Previously Identified Cultural Resources in Visual Proximity (1-mile buffer) to the Project Area
1584	15	3631		Please, add that the project is in Archaeological Region 5c -- Central Lakes Coniferous to place it in the proper context	Modify EAW to address comment.	Thank you for the comment. A description of the Project Area's location within Archaeological Region 5C will be added to provide appropriate context. **EDIT** **Added Language** The Project Area is situated within Archaeological Region 5C (Central Lakes Coniferous – Central), as defined by the Minnesota Department of Transportation's Mn/Model framework, which is characterized by glaciated landscapes, abundant lakes and wetlands, and coniferous forests. This regional context informs the potential for undiscovered archaeological resources.[R3_Cmt_#1584]
1585	15	3631		Submittal identifies that "...cultural resources investigations, including tribal cultural resources investigation, an archaeological reconnaissance..." would be completed before construction. Although the text references the Federal Section 106 process, RGU notes that the Draft Scoping Decision will likely require similar requirements for the EIS. It is likely that tribal entities would be invited to participate in similar inventories to ensure that tribal resources are accurately identified, thoroughly evaluated, and appropriately considered throughout the process.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1586	15	3633		Please, state that the project has an unknown site potential based on Survey Implementation Modeling developed by the MnOSA	Modify EAW to address comment.	**EDIT** **Original** The cultural resources records check indicates that the Project Area has not been previously investigated for cultural resources; therefore, it is possible that undocumented archeological sites and/or historic architectural resources persist within the area. **Modified** The cultural resources records check indicates that the Project Area has not been previously investigated for cultural resources; therefore, it is possible that undocumented archeological sites and/or historic architectural resources persist within the area. Based on available information and the lack of prior archaeological survey coverage, the Project Area is inferred to have unknown site potential under the

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						Survey Implementation Model developed by the Minnesota Office of the State Archaeologist. [R3_Cmt_#1586]
1587	15	3642		Please include a statement regarding potential mitigation, minimization, or avoidance measures for the project.	Modify EAW to address comment.	Thank you for the comment. A statement regarding potential avoidance, minimization, and mitigation measures will be added to the EAW. The language will reflect Talon's commitment to coordinate with the State Historic Preservation Office, Tribal Historic Preservation Offices, and other appropriate parties, consistent with applicable requirements. **EDIT** **Added Language** If historic properties or archaeological sites eligible for listing in the National Register of Historic Places are identified within the Project Area, Talon would coordinate with the State Historic Preservation Office, Tribal Historic Preservation Offices, and other appropriate parties to develop avoidance, minimization, or mitigation measures. Avoidance of impacts would be prioritized where feasible. If avoidance is not possible, mitigation measures such as data recovery excavations or formal documentation would be implemented in accordance with applicable guidelines. [R3_Cmt_#1587]
1588	15	3642		RGU notes that planning and coordination for when the inventory and tribal surveys will be completed for the information to be brought into the EIS at the appropriate time. Future discussion item.	Modify EAW to address comment.	Thank you for the note. No changes to the EAW are necessary.
1589	16	3681		RGU notes the Draft Scoping Decision will likely include a visibility analysis, including under nighttime conditions that should reflect proposed lighting of both open and enclosed areas at the surface mine facility and the railway spur. Sensitive receptors could include nearby Tribes, residents, lake home communities, and recreational visitors to parks and other natural areas plus local biota.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1590	16	3693		In addition to light pollution impacts from the surrounding communities and the project itself, there may also be additional light pollution impacts from McGregor and Cromwell.	Consider comment; modify EAW as warranted.	Thank you for the comment. Acknowledgment of additional nearby communities, including McGregor and Cromwell, will be added to the discussion of existing light pollution sources. **EDIT** **Original** 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 the project would significantly alter the current night-sky quality in the park. **Modified**

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						Given the existing sources of light pollution from nearby communities — including Floodwood, McGregor, Cromwell, and lake house communities around Big Sandy Lake, Minnewawa Lake, and Round Lake — 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 the Project would significantly alter the current night-sky quality in the park. [R3_Cmt_#1590]
1591	17.a	3750		EAW states that prior to release mine exhaust air would undergo a "filtration or scrubbing process." EAW needs more specifics as to control technology and outcome.	Modify EAW to address comment.	Thank you for the comment. The exhaust air from the underground mine is anticipated to be treated with a wet scrubber prior to release. These systems are intended to reduce particulate emissions. Information regarding the expected control technologies and their performance is expected to be provided as part of the EIS data submittal or during the permitting process.
1592	17.a	3763		For Ore Transfer Building, the EAW states that Talon would install control equipment to meet applicable regulatory requirements, which could include assessment in the context of MDH Health Risk Guidance and other protocols.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1593	17.a	3784		The EAW states that 40 CFR Part 60 Subpart OOO, which specifically pertains to crushing of ore and waste "may" apply to the project. What basis does Talon have, if any, for suggesting this federal regulation might not apply?	Answer question.	Thank you for the comment. The reference to 40 CFR Part 60 Subpart OOO as potentially applicable reflects the current planning stage of the Project and acknowledges that some materials processed on site—such as development rock (commonly referred to as waste rock in Minnesota regulations)—may fall under the definition of nonmetallic mineral. While the Project is primarily focused on the extraction and handling of metallic sulfide ore, there may be instances where crushing of non-metallic materials occur in support of mine development. Therefore, Subpart OOO may apply to certain equipment or activities, depending on material type and handling procedures. A definitive applicability determination will be made as part of the detailed air permitting process and included in the Environmental Impact Statement (EIS) analysis.
1594	17.a	3807		This line states Talon has constructed an on-site meteorological station. MPCA approved the tower and location in September 2022. Edit the text to read: "Talon has constructed an MPCA-approved meteorological station…"	Modify EAW to address comment.	Thank you for the comment. Talon confirms that the on-site meteorological station was sited and constructed consistent with MPCA approval requirements. No text change is proposed as the approval status is appropriately documented.
1595	17.b	3821		Section 6.14 Line 1377, states or implies than an all-diesel fleet will likely be used. This conflicts with Section 17.4, and Section 17.6, saying electric vehicles will be used if available. Please review to make sure these statements don't conflict, and use worst case scenario of all diesel fleet to be safe.	Modify EAW to address comment.	Thank you for the comment. Section 6 of the EAW describes the proposed vehicle fleet as being all diesel-powered for purposes of the project description and associated impact assessments. This represents the current design basis and provides a conservative approach for analysis. Section 17 of the EAW notes that Talon is exploring opportunities to incorporate electric vehicles into operations where feasible; however, no commitment to a fully electrified fleet is made.

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						Should electric vehicle options become available and practical, their use would be incorporated to the extent feasible, but the EAW impact assessments are based on the conservative assumption of an all-diesel fleet.
1596	18.a	3873	18.1 and 18.2	Emissions from land use change (e.g. converting forest and wetland to developed areas) should be included in the construction phase and in the operations phase only if ongoing land use changes are anticipated. Land use change emissions should be categorized as sub-type "area". It is not clear how the total net CO2 fluxes from the EPA's national GHG inventory will aid in your calculations because 1) it is important to consider all greenhouse gases, not only CO2, and 2) emissions factors for all gases (CO2, N2O, and CH4) from the IPCC documentation cited should suffice to estimate these fluxes. Finally, it is unclear what the emissions sub-type "carbon sink" refers to. It was mentioned that some trees and shrubs might be planted on site during operation or post-closure. Any resultant carbon sequestration from trees planted during operation could be included as a type of land use change within the operation phase. Additionally, restoration of the project site after mine closure is not to be included in the lifecycle GHG emissions of the project.	Modify EAW to address comment.	Thank you for the comment. The GHG emissions tables (Tables 18.1 and 18.2) have been updated to clarify the use of the “area” sub-type for land use change and to better align with standard inventory practices. These modifications address several of the considerations raised. A more detailed emissions quantification and methodology, including emissions from all relevant greenhouse gases, will be provided in the Environmental Impact Statement (EIS) data submittal.
1597	18.a	3876		Should "use change" say "land use change" here? If so, please correct.	Answer question; modify text as warranted.	Thank you for the comment. Talon agrees with the suggestion and will modify the language to read "land use change" for clarity
1598	18.a	3894	Table 18.2	How does Talon propose to address rail transport of ore GHG emissions?	Answer question.	Thank you for the comment. A Scope 3 entry for rail transport of ore will be added to Table 18.2, using emission factors from the EPA Greenhouse Gas Emission Factors Hub and EPA SmartWay rail data. **EDIT** Scope: 3 — because Talon doesn’t own or operate the rail transport (it’s third-party). Type of Emission: Transportation. Emission Sub-type: Rail Transport of Ore. Calculation Methods: Use EPA Greenhouse Gas Emission Factors Hub for fuel use or CO_2 per ton-mile factors.
1599	18.a	3894	Table 18.2	EAW uses the term "conversion" in terms of impacts on carbon sink of wetlands and peatlands. Does this include dewatering or indirect loss of function as well as excavation for construction?	Answer question; modify text as warranted.	Thank you for the comment. The EAW addresses greenhouse gas emissions from direct land conversion activities, including excavation and filling.

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1600	18.b.iii	3929		RGU notes the treatment of GHGs requires additional discussion. However, the Draft Scoping Decision will likely require estimated emissions to be quantified, with comparisons to statewide and national economy-wide GHG emissions totals but also in the context of the state's GHG reduction goals. As a technical issue, while the downstream benefits of reduced GHG emissions due to the use of the mined metals in EVs and batteries will assist in global decarbonization efforts, those types of reductions are generally considered "scope 4" and are out of scope for this type of assessment. It would be informative and helpful to see estimates of the downstream benefit, but those estimates should not be subtracted from the net emissions from scope 1, 2, and 3 accounting.	Advisory only.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1601	19	3935		Are there city or county noise regulations that would apply to construction or operation of the Project? Please, clarify.	Answer question.	Thank you for the comment. Talon is not aware of any applicable county or city noise ordinances that would apply to the Project. The Project will comply with Minnesota Pollution Control Agency (MPCA) state noise standards, as outlined in Minnesota Rules Chapter 7030, and will address noise-related considerations as part of the Environmental Impact Statement (EIS) and permitting process.
1602	**19**	3935		Section needs to address drilling and other loud noise producing activities closer to the surface during construction.	Consider comment; modify EAW as warranted.	Thank you for the comment. The EAW has been edited to include additional information addressing noise during construction. **EDIT** **Added Language** While construction noise is temporary and variable in nature, it may result in elevated noise levels near the Project Area during active construction periods. To minimize potential impacts to nearby sensitive receptors, construction activities would be conducted in compliance with applicable state noise standards. Additional best management practices, such as maintaining equipment in good working order and using noise-dampening technologies where feasible, may be implemented to further reduce construction-related noise. [R3_Cmt_#1602]
1603	19	3941		Commenter notes the baseline noise data should be collected when no Talon drills and vehicles are operating. RGU notes that scoping will likely identify what constitutes sensitive receptors, which could include homes, farms, and churches in Tamarack and Project Area; this could include nearby areas where wildlife could be impacted. Potential noise sources would likely include rail yard and rail transport noise.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1604	19	3946		RGU notes the Draft Scoping Decision will define potential noise sources, which could include additional RR trips associated with project operations.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1605	19	3952		RGU notes the Draft Scoping Decision will likely require development of noise impact assessment criteria for which to compare project noise levels to ambient conditions.	Answer question.	Thank you for the comment. Talon acknowledges that the Draft Scoping Decision will likely include a requirement to develop noise impact assessment criteria for comparison of Project noise levels to ambient conditions.
1606	19	3952		If known, the number and location of noise monitoring stations should be provided. RGU notes the Draft Scoping Decision will likely require identification of noise monitoring stations and sensitive receptors as background information for the EIS.	Consider comment; modify EAW as warranted.	Thank you for the comment. Identification of noise monitoring locations and sensitive receptors will be considered as part of the EIS process.
1607	19	3974		RGU notes that the Draft Scoping Decision will require a noise study using standardized modeling, calculations, and manufacturer data that includes assessing potential noise reductions due to mitigations. Applicability to the assessment regarding noise reduction from vegetation and natural barriers is open to question. Whether the claim of 30 decibels of potential noise transmission loss due to installation of sound-absorbing materials would also need to be studied.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1608	19	3974		If known identify the distances to the nearest noise-sensitive receptors.	Answer question.	Thank you for the comment. Identification of noise-sensitive receptors and associated distances will be addressed during the EIS process.
1609	19	3974		How would noise during construction be mitigated? What noise limits will construction be subject to? Please, address in text.	Answer questions; modify text as warranted.	Please see the response to comment 1602.
1610	19	3995		Will vibration monitoring be conducted during blasting to confirm that thresholds are not exceeded?	Answer question.	Thank you for the comment. The need or requirements for vibration monitoring would be addressed as part of the permitting process and operational mitigation measures, as appropriate.
1611	19	4007		Please, list the sources of noise that will not be enclosed within the building.	Answer question.	Thank you for the comment. The final determination of enclosed versus non-enclosed noise sources will be addressed as part of the detailed noise analysis submitted for the EIS.
1612	20.a	4014		Please identify whether spring weight restrictions will have any impact on overall plans and operations due to adjusting deliveries during construction or long term operation.	Modify EAW to address comment.	Thank you for the comment. The primary access route to the Project Area is County State Aid Highway (CSAH) 31, which is designated by Aitkin County as a 10-ton route, including during the spring load restriction period. As a result, seasonal weight restrictions are not expected to impact construction or operational deliveries to the site. Oversize or overweight loads, if required, would follow applicable permitting procedures regardless of season. **EDIT** **Original** During construction and operation, the Project would be accessed from an existing two-lane paved road (CSAH 31). **Modified** During construction and operation, the Project would be accessed from CSAH 31, an existing two-lane paved road

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						designated as a 10-ton route by Aitkin County, including during spring load restriction periods. [R3_Cmt_#1612]
1613	20.a	4014		Please articulate differences in trip generation between construction and long term operations.	Modify EAW to address comment.	**EDIT** **Original** Using the personnel data provided in Section 6 (Project Description) and assuming all future employees drive their own vehicles to work, it can be estimated that the Project would cause an increase in traffic volumes twice a day. Due to the rural nature of the Project location, alternative transportation modes are impracticable. [R2_Cmt98] **Modified** Using the personnel data provided in Section 6 (Project Description) and assuming all future employees drive their own vehicles to work, it can be estimated that the Project would cause an increase in traffic volumes twice a day. During the construction phase, traffic volumes are expected to vary depending on construction activities and scheduling. In addition to construction workers commuting to and from the site, vehicle trips would be generated by the delivery of materials, equipment, and supplies. Traffic volumes may be higher during periods of site preparation, foundation work, and equipment staging. In contrast, once operational, traffic would be more stable and consist primarily of regular employee shift changes, along with periodic deliveries for maintenance, supplies, and consumables. [R3_Cmt_#1614] Due to the rural nature of the Project location, alternative transportation modes are impracticable. [R2_Cmt98]
1614	20.a	4014		Please, provide information about the currently projected number of all trips and include the currently projected time of day and seasonality of those trips. Please, provide a ballpark estimate on oversize/overweight deliveries during construction and long term operation.	Modify EAW to address comment.	Thank you for the comment. The Environmental Assessment Worksheet (EAW) provides a general overview of anticipated traffic volumes and peak activity periods associated with construction and operation. Detailed projections of total trips by time of day, seasonality, and estimates of oversize or overweight deliveries will be developed and included in the data submittal for Environmental Impact Statement.
1615	20.a	4014		Please provide any sources, resources, or references used to document project trip generation.	Answer question.	Thank you for the comment. Estimates of project trip generation in the EAW are based on information provided in Section 6 (Project Description), including anticipated staffing levels and shift schedules. Additional transportation analysis will be provided in the Environmental Impact Statement data submittal.
1616	20.b	4042		If additional road construction is "needed" to accommodate Project traffic and minimize congestion, where would the funds come from, Talon/Rio Tinto or Minnesota taxpayers?	Answer question.	Thank you for the comment. The need for any roadway improvements would be evaluated as part of the ongoing review process. If improvements are determined to be necessary, funding responsibilities would be addressed in coordination with the appropriate transportation agencies as part of future permitting and mitigation planning.

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1617	21.a	4073		EAW states "The broader region surrounding the Project Area may experience cumulative impacts from the Project in combination with other industrial activities" and that the EIS would evaluate how ongoing effects of the Project "combine with other industrial or development projects" To what other industrial activities or projects, apart from "regional scale" drilling and mining by Talon, does this text refer?	Answer question; modify text as warranted.	Thank you for the comment. The reference in the EAW to other industrial activities reflects primarily ongoing mineral exploration activities in the region. The EIS will further evaluate cumulative impacts and is expected to consider additional activities and land uses in the region, such as logging, farming, and peat mining, where they may contribute to cumulative effects. **EDIT** **Original** The broader region surrounding the Project Area may experience cumulative impacts from the Project in combination with other industrial activities and transportation networks. The EIS would evaluate these impacts relative to current regional conditions, which reflect decades of land use changes and development. **Modified** The broader region surrounding the Project Area may experience cumulative impacts from the Project in combination with other industrial activities, such as logging, farming, and peat mining, as well as existing transportation networks. The EIS would evaluate these impacts relative to current regional conditions, which reflect decades of land use changes and development.
1618	21.a	4080		Please clarify if TMP means "Tamarack Mining Project". If so, please use "Project" for consistency.	Modify EAW to address comment.	Thank you for the comment. The text of the EAW will be edited accordingly.
1619			Figure 8	This figure would be more useful if actual groundwater levels from wells were used to show depth to water values. Revise or add figure.	Modify Figure to address comment.	Thank you for the comment. The figure is intended to support scoping of the EIS using publicly available information. Measured groundwater levels will be incorporated where appropriate in the EIS and supporting technical documents.
1620			Figure 10	Consider removing zoning types from legend that are not shown on the map (Residential, Shoreland)	Consider comment; modify EAW as warranted.	Thank you for the comment.
1621			Figure 16	This figure is confusing. The purpose is to denote surface waters within the two HUC 12 watersheds. However, there is inconsistency in what is noted as a DNR Public Water (for instance, why is Big Sandy dark blue but Lake Minnewawa is not?). The map should better clarify what is and what is not a DNR Public Water. There are many Public Waters streams shown on the map, but only the Tamarack is noted as a Public Water. Also, need to differentiate between Public Waters outside the watersheds and NHD flowlines.	Modify Figure to address comment.	Thank you for the comment. The figure was developed to support scoping of the EIS by depicting the Project Area within its two HUC12 watersheds. Big Sandy Lake was included because it is the downstream receiving water for surface water originating from both HUC12 watersheds encompassing the Project Area.
1622			Figure 17	It is difficult to visually differentiate the contrast between aerial background photo with the NHD flowlines and water bodies, public ditches, and watercourses and basins that are Public Waters on this figure (and most other figures, as well).	Modify Figure to address comment.	Thank you for the comment.

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				Consider if there is an alternative means of presenting the information.		
1623			various figures	Typo in legend (Project is spelled "Projet")	Modify Figure to address comment.	Thank you for the comment. The error has been corrected.
1624			Figure 2	USGS mapping shows mining area, including decline shaft, is primarily wetlands. What modeling is Talon planning to use to estimate mine drawdown impacts on wetlands?	Answer question; modify text as warranted.	Thank you for the comment. Evaluation of potential drawdown impacts on wetlands will be addressed in the EIS.
1625			Figure 3	Would there be any waste rock or excavated peat stored outside of the Ore Transfer Building? If so, what would be the location and the maximum volume of that storage be? Is any of the storage lined?	Answer questions; modify text as warranted.	Thank you for your question. Regarding waste rock, the EAW states: "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. " Regarding overburden, we have updated the EAW text as follows: **EDIT** **Original:** Overburden excavated during construction of surface facilities and from the box cuts and declines would be transported offsite to an appropriately licensed landfill. **Modified:** Overburden excavated during construction of surface facilities and from the box cuts, SEM section of the and decline access and surface raises would be transported offsite to an appropriately licensed landfill. [R3_Cmt_#1625]
1626			Figure 3	The layout identifies an industrial stormwater pond, but no contact water storage. What would be the maximum volume of untreated contact water and where would it be stored? Would the industrial stormwater pond be lined?	Answer questions; modify text as warranted.	Thank you for the comment. Contact water generated underground is managed within the mine through a network of sumps and pumps. Design details, including whether the ponds would be lined, will be addressed through the EIS and applicable permitting processes.
1627			Figure 6	There are many water supply wells within one mile of the proposed Project and several are immediately adjacent to the Project boundary. The Proposer should identify all water supply wells, their owners, use, depth, and distance from the proposed project boundary.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.

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1628			Figure 7	How will the Water Treatment Plant discharge be directed north to Tamarack River, and not south and west through County Ditches 23, 14, and 13 to Sandy River or Minnewawa Creek since the wetland systems in the area are connected?	Answer question.	Thank you for the comment. The design and operation of the Contact Water Treatment Building include engineering controls that direct treated discharge to flow northward through an established ditch network that ultimately leads to the Tamarack River. While regional wetlands are hydrologically connected, topography and site grading influence flow direction. The EAW recognizes that most surface water from the Project area—including water discharged from the Contact Water Treatment Building—is expected to follow the north ditch network. Additional hydrologic modeling and ditch capacity evaluations will be presented as part of the EIS data submittal to confirm expected flow paths and assess potential downstream connectivity and routing.
1629			Figure 9	RGU notes the Draft Scoping Decision could include the location of past sumps, for drilling or any other purposes, as part of the information to support the EIS assessment of contamination and hazardous waste.	Advisory. Future discussion topic for development of Draft Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1630			Figure 10	Consider converting Figure 10 into two figures. One would be for Zoning and a second would be for State & County Administrative Land Boundaries. Superimposing both on the same figure is difficult to see.	Modify Figure to address comment.	Thank you for the comment.
1631			Figure 12	Figure shows Pas and Mmi, but the Scoping EAW speaks of SMU, SMSU, CGO (CGO East, CGO West), FGO, MZNO, SED, and 138, and not Pas and Mmi. What are the positional relationship of all these rock types?	Answer question; modify text as warranted.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.
1632			Figure 18	Has FEMA completed a study to determine flood hazard for Tamarack, MN, including the surface mine and rail transport facilities? The figure cites three layers with an effective date of 3.15.1982. If not, address in the submittal and figure.	Answer question; modify text as warranted.	Thank you for the comment. As noted in the EAW, the existing FEMA floodplain mapping within the Big Sandy Lake watershed—including for the Tamarack, Prairie, and Sandy Rivers—dates to 1982 and is considered “unmodernized” by FEMA. Figure 17 reflects the currently available FEMA data, which confirms that the Project Area lies outside the delineated floodplain.

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
CO2	Carbon Dioxide
CO2e	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
H2S	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