DEPARTMENT OF NATURAL RESOURCES

Tamarack Mining Project EIS Scoping

DNR Comments on Talon Nickel (USA) LLC's Revised Project Proposal

On December 26, 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 tables include comments* made during the third and fourth rounds of RGU review as well as Talon's responses submitted December 26, 2025. A list of abbreviations and acronyms is provided after the tables.

*The Round One and Two tables have been removed since those comments have been deemed resolved and did not require Talon's response for this round. Comments from those rounds that are not in this document can still be found in the Round 3 Comments Document on the Project webpage.

Round Three Comment Response 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	Round 4 RGU Response and Requested Action 09/18/2025	Response and Treatment in EAW 12/26/2025
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	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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]	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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	Resolved. Requested Action: None.	
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.	Due to peat's high organic and water content, low bulk density, and potential for CO2 release, commenter recommends considering other disposal options, including wetland and habitat restoration projects. Requested Action: Advisory.	
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 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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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]	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Comment considered resolved for this round, however there are comments are in round 4 that are related to this topic. Requested Action: None.	
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.	Concrete Slabs have joints for crack control. These joints can provide a conduit for water drainage into the subsoil. A drainage collection system and/or an under slab liner should be considered. Requested Action: Consider comment.	Thank you for the comment.
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Please add a leader pointing to the CB cell specifically. Requested Action: Revise graphic as requested.	Thank you for the comment. **EDIT** This image has been changed to show the cutoff cell's construction method for the same Minnesotan project.

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								The Proposer therefore assumes the comment is no longer applicable.
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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."	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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".	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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."	RGU notes it will consider the definition of contact water in development of the scoping documents. Requested Action: Advisory.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved, and RGU notes that details to support CB wall integrity against blasting will be needed in the EIS analysis. Requested Action: Advisory.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Please clarify the use of the term "permanent;" is this to distinguish this approach from a "temporary" measure that might be removable? As for the EIS, it can be expected for the scoping documents to require detailed information on the proposed design, including engineering specifications and anticipated lifespan. Requested Action: Answer question. Advisory.	Thank you for your comment. The PVC membrane would be used as determined necessary by the engineering and construction teams based on observed inflow. **EDIT** **Original** "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." **Modified** "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, which would be separated

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								when required by a waterproof membrane. [R4_Cmt_#1289]"
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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	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.	Resolved. Requested Action: None.	

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				MTB use in an underground mine with a similar climate?				
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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."	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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."	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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 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]	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.”	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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	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.	Resolved. Requested Action: None.	

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				intake, strict controls (e.g., XXX; YYY) would be maintained...				
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.	Resolved. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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).	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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	Resolved. Requested Action: None.	

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						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.	Resolved. Requested Action: None.	
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.	Resolved, and RGU notes that details regarding the sourcing and chemistry of the aggregate will be required in the EIS. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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."	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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						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]	resolved. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	

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						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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Is it part of the project design that the stopes will be permeable? Requested Action: Answer question.	Thank you for the comment. The Project design does not include measures intended to make the stopes impermeable, such as lining or shotcreting. At the same time, the design does not presume or define the stopes as permeable; hydraulic characteristics would be a function of backfill materials and in situ conditions rather than a specific design objective.
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.	RGU notes that information may be included in the EIS. Requested Action: None.	
1333	6.b	1215		Section 6.10. - Please, generally describe actions to be taken if unanticipated fractured bedrock is encountered and/or	Answer question.	Thank you for the comment. In a Conventional Raise Bore, unanticipated groundwater encountered will drain to the underground shaft below, and	Resolved Requested Action: None.	

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				unanticipated groundwater is encountered during boring operations		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 would be developed conventionally, while Surface Raise #2 would be driven “blind” (i.e., top down)."	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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	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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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				it in order to assess the potential risk of excess materials underground.				
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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]	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	What is the basis for minimum water quality Requirements? Requested Action: Answer question.	Thank you for the comment. The text of the EAW has been modified for clarity. The text has been revised for clarity. The previously cited water quality values were presented to illustrate general thresholds at which concrete performance could be adversely affected, rather than to indicate that water of that quality would be used for cemented rock fill (CRF) production. The revised language reflects standard industry practice, which evaluates the suitability of mixing water based on concrete performance considerations rather than prescriptive chemical limits. The project anticipates using groundwater (e.g., well water) and/or treated water from the contact water treatment plant for CRF production, which are consistent with typical concrete production practices. **EDIT** **Original** "The water quality requirements for CRF production specify no organic material, a pH greater than 4, sulfate content below 2,000 mg/L, and chloride levels below 4,500 mg/L.

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								[R2_Cmt_#884]" **Modified** "Water used for cemented rock fill (CRF) production would be suitable for concrete mixing and consistent with standard industry practices for hydraulic cement concrete. Potable water may be used without additional qualification, while non-potable water sources may be used provided they do not adversely affect concrete performance, such as strength development or setting characteristics. At this stage, water for CRF production is anticipated to be sourced from groundwater (e.g., well water) and/or treated water from the contact water treatment plant. These sources are commonly used in concrete production and would be suitable for CRF production based on performance considerations rather than prescriptive chemical thresholds. [R4_Cmt_#1346]"
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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 Sulfate content of the water should be < 2,000 mg/L" The data	Resolved. Requested Action: None.	

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						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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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).	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
1357	6.b	1318		To the degree known, has a sufficient local external source of aggregate fill been identified and which transportation routes	Answer question.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved and will be addressed in the DSDD.	

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				would be used to move aggregate to the site?			Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	How will fresh air exchange take place for areas of the mine deeper than Surface Raise #2? Requested Action: Answer question.	Thank you for the comment. Fresh air would be delivered to underground workings through the portal and Surface Raise #1, which would function as fresh air intake pathways. Intake air would be distributed through the decline ramp and underground drifts to active mining areas, including areas located deeper than Surface Raise #2. Used air would then be routed through the underground ventilation network to Surface Raise #2, which would function as the exhaust ventilation raise. This configuration allows fresh air to circulate through progressively deeper portions of the mine by using the

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								decline ramp and internal ventilation controls to direct airflow to active areas, with exhaust air returning to surface through the designated exhaust raise.
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	As the project details develop, include what other control measures would be employed to minimize particulate emissions. Requested Action: Advisory.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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]	Resolved. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	

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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."	Resolved. Requested Action: None.	
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.	Resolved Requested Action: None.	
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"	Resolved. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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).	Resolved. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	

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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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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).	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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."	Resolved. Requested Action: None.	
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."	Resolved. Requested Action: None.	

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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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	What are the other planned fill sources for site reclamation and final grading? Requested Action: Answer question.	Thank you for the comment. Specific sources of fill material for site reclamation and final grading have not yet been identified. The current design anticipates that much of the site would be regraded using available on-site materials. If additional material is needed to support reclamation objectives, suitable off-site sources would be identified at a later stage. Detailed material sourcing, quantities, and associated cost estimates would be addressed as part of the

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								Reclamation and Closure Plan to be developed for permitting, rather than at the EAW stage.
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.	DSDD may require estimates of ore and waste rock generation material balance during the Decline Tunnel and other mine development to support analysis of potential rail transport impacts. Requested Action: Advisory.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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	Answer question; modify text as warranted.	Thank you for the comment. Please see section 6.21.6 Dust Control System that provides these details.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	

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				wet scrubbers? What indoor air quality control is proposed?				
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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

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						outside, including the roof, the Ore Transfer Building (see Figure 5). [R3_Cmt_#1393]		
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	

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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.	Please clarify that the current estimate of 800-1600gpm maximum mine inflow does not include creation or enlargement of fractures due to blasting. Requested Action: Provide clarity.	The 2020 screening mine inflow estimate does not account explicitly for creation or enlargement of fractures due to blasting. However, the EIS numerical groundwater model will address the relative impact on predicted mine inflows from the potential creation or enlargement of fractures due to blasting through sensitivity simulations. Often the influence on predicted inflows is negligible because their extent is sufficiently small such that the water storage in these features is quickly depleted and the replenishment flow is dependent on the undisturbed, bulk rock mass with a much lower ability to transmit water.
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]	Resolved. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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,	Resolved. Requested Action: None.	

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						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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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]	Resolved. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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	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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				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				
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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).	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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	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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				maintain water quality standards in surface waters.				
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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	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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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				course of the EIS to support traffic analysis assessment (among other potential impacts).				
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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. 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.	Resolved. Requested Action: None.	
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.	Resolved Requested Action: None.	

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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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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).	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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 Project Description to provide an illustration of the proposed three parallel full unit train length tracks for EIS preparation.	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 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	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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						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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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 management practices in accordance with the project's Fugitive Dust Control Plan developed as part of the EIS and permitting process."	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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,	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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						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	Resolved. Requested Action: None.	
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."	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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	Resolved. Requested Action: None.	

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						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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved and will be addressed in the scoping EAW. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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	Resolved for the purpose of scoping. To be addressed in EIS.	

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						appearance but would connect directly to the Ore Transfer Building, reducing exposure to open air.	Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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	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.	Resolved and will be addressed in the DSDD Requested Action: None.	

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				Quaternary materials and shallow and deep bedrock.				
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.	Resolved. Requested Action: None.	
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 significantly improve geotechnical conditions, so backfill efforts are focused on larger mined-out stopes.	Resolved. Requested Action: None.	
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]	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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						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.	Resolved. Requested Action: None.	
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.	RGU notes that the scoping documents may require project planning to clearly use long term trend data. Requested Action: Advisory.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
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."	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Resolved and to be addressed in the DSDD. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD Requested Action: None.	

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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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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,	Modify EAW to address comment.	Thank you for the comment. The requirement will be added to Table 9.1.	Resolved. Requested Action: RGU will make this correction in the Scoping EAW.	

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				part 4720.0010. This requirement should be added to the table.				
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).	Resolved. Requested Action: None.	
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** 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]	Resolved. Requested Action: None.	
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]	Resolved. Requested Action: None.	

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						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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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**	Resolved. Requested Action: None.	

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						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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: RGU will take the recommendation under consideration.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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 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]	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
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]	Resolved. Requested Action: None.	
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).	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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	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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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				affect flooding, including possibility of reversal of water flow direction.				
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'	Resolved. Requested Action: None.	
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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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	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.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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				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.				
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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 protected for aquatic life and recreation. The specific classification for each waterbody will be confirmed in the EIS. [R3_Cmt_#1494]	Resolved and will be addressed in the DSDD and/or SEAW. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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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.	Will address this comment via similar comments from Round 4. Requested Action: None.	
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.	Resolved Requested Action: None.	
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.	Resolved Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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** **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	Resolved Requested Action: None.	

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						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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	RGU will follow up with the commentor. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD and/or SEAW. Requested Action: None.	
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]	RGU will follow up with the commentor. Requested Action: None.	
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.	Resolved Requested Action: None.	

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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.	Resolved and will be addressed in the DSDD and/or SEAW. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the SEAW. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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 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.	Resolved and will be addressed in the EIS. Requested Action: None.	
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).	Resolved and will be addressed in the SEAW. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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	Modify EAW to address comment.	Thank you for the comments. These factors will also be further addressed in the EIS data submittal.	Resolved and will be addressed in the SEAW. Requested Action: None.	

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				suggest the ditch can accommodate the increased flow from project discharge seems to discuss natural stream channels.				
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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**	Resolved. Requested Action: None.	

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						"...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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the SEAW. Requested Action: None.	
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 water resources during and after operations will be included in the EIS data submittal.	Resolved and will be addressed in the DSDD and/or EIS. Requested Action: None.	
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	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.	Resolved and will be addressed in the EIS. Requested Action: None.	

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				on site. This applies to all mentions of stormwater ponds throughout the EAW.				
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.	Resolved and will be addressed in the EIS. Requested Action: None.	
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.	Resolved and will be addressed in the EIS. Requested Action: None.	
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.	Resolved Requested Action: None.	
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 Scoping	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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					Decision Document.			
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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]	Resolved Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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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.	Resolved Requested Action: None.	
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 Scoping Decision Document.	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Follow up question: where would the removed groundwater be stored, treated, and/or discharged? Requested Action: Answer question.	Thank you for the comment. Groundwater encountered during excavation or construction activities would be managed as construction water. As described in the EAW, construction water and construction stormwater would be managed using appropriate best management practices and discharged to the watershed near the northern boundary of the Project Area. The handling, treatment, and discharge of construction water would be evaluated in accordance with applicable requirements, with additional detail to be provided in the EIS data submittal.
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.	Advisory. Future discussion topic for development of Draft Scoping	Thank you for your comment. Future discussion item, as necessary, in development of Draft Scoping Decision Document.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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				Consideration of contingency planning around potential drought years may make sense to pursue.	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. [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.	Resolved and will be addressed in the EIS. Requested Action: None.	
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.	Resolved and will be addressed in the EIS. Requested Action: None.	

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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.	Resolved and will be addressed in the DSDD and EIS. Requested Action: None.	
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.	Resolved and will be addressed in the EIS. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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 impacts and proposed monitoring would be further analyzed as part of surface, groundwater, and wetland studies being completed to support the EIS.	Resolved and will be addressed in SEAW and/or DSDD. Requested Action: None.	

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						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.	Resolved Requested Action: None.	
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.	Resolved Requested Action: None.	
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).	Resolved Requested Action: None.	
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	Modify EAW to address comment.	See the response to comment 1549.	Resolved and will be addressed in EIS. Requested Action: None.	

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				considered. RGU notes Draft Scoping Decision will likely include detailed assessment of this issue for EIS analysis.				
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.	Resolved. Requested Action: none.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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	Resolved. Requested Action: None.	

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						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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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						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.		
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.	Resolved. Requested Action: None.	
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.	RGU notes that the scoping EAW will add clarity that the gravel is outside of the Ore Transfer building. Requested Action: None.	
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).	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
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]	Resolved. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	

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

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						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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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 Survey Implementation Model developed by the Minnesota Office of the State Archaeologist. [R3_Cmt_#1586]	Resolved. Requested Action: None.	
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	Resolved. Requested Action: None.	

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						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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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** 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	Resolved. Requested Action: None.	

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						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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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. Should electric vehicle options become available and practical, their use would be incorporated to the extent	Resolved. Requested Action: None.	

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						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.	Resolved. Requested Action: None.	
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	Resolved. Requested Action: None.	
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:	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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						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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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	Resolved. Requested Action: None.	

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						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.	Resolved at this stage. Will be addressed in the Draft Scoping Decision document. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	

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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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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 designated as a 10-ton route by Aitkin County, including during spring load restriction periods. [R3_Cmt_#1612]	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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						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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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	Resolved. Requested Action: None.	

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						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.	Resolved. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Change made to the figure, as that the ditches are now shown in a different color. No other changes made as requested. Comment resolved for Scoping EAW but will be addressed in more detail in the EIS. Requested Action: Advisory.	
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). Consider if there is an alternative means of presenting the information.	Modify Figure to address comment.	Thank you for the comment.	Resolved. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	

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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]	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	
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.	Resolved for the purpose of scoping. To be addressed in EIS. Requested Action: None.	

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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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	
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.	Resolved and will be addressed in the DSDD. Requested Action: None.	

Round Four New Comments Table

Comment No.	EAW Item No.	EAW v3 Line 1	Table, Figure, Graphic	Round 4 RGU Comment to Talon 09/18/2025	Requested Action by RGU	Talon Response and Treatment in EAW 12/26/2025
1633	6.b	559		Will there be any interference with traffic on public roads? And will be there be a plan or clean-up to address any dirt, mud, etc. that might be a hazard on the road to public safety?	Answer question.	Thank you for the comment. The Project would be accessed from CSAH 31, an existing two-lane paved roadway with relatively low baseline traffic volumes. Construction and operation would result in increased traffic, primarily during shift changes and periods of material delivery. Potential traffic effects would be evaluated through a traffic impact study to be completed for the EIS. Project-related traffic would comply with applicable transportation and

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						public safety requirements. Standard construction practices would be used to minimize roadway safety concerns, including the tracking of dirt or debris onto public roads. Additional measures, if warranted, would be identified through the traffic impact study and addressed during subsequent permitting.
1634	6.b	559	Table 6.1	What is the duration of the use for the 200 acres of temporary uses? Does this include storage of overburden and/or waste rock?	Answer question.	Thank you for your question. The temporary areas would need to be available for use throughout the project's construction phase. As stated in the EAW, "Overburden excavated during construction of surface facilities and from the box cut, SEM section of the decline, and surface raises would be transported offsite to an appropriately licensed landfill." Similarly, the EAW explains that "The Decline Tunnel's construction through the bedrock would generate ore and waste rock. This rock would be managed in the Ore Transfer Building and shipped via rail to the concentrator where it would be used for commissioning."
1635	6.b	561		Please clarify: is the aggregate buffer area intended to be an outdoor stockpile?	Answer question.	Thank you for the inquiry, you are correct. As the EAW states "This aggregate would have its own buffer outside the Ore Transfer Building, and would be conveyed into the building as required."
1636	6.b	592	Graphic 6.2	Graphic 6.2 does not identify any surface infrastructure for contact water temporary storage. Confirm that there are no plans for any storage of contact water, which is consistent with the text at line 1534.	Provide clarity.	Thank you for the comment. Clarification on the specific EAW text being referenced would be helpful, as the line numbering can vary depending on document format and review settings. The EAW does not identify routine outdoor storage of contact water generated from Project operations. Contact water would primarily be generated within enclosed facilities and managed through the Contact Water Treatment Plant. As part of the water treatment system

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						design, a surface tank would be included to support operational flexibility within the treatment process. This tank would be used to temporarily manage water during start-up, shutdown, maintenance, or upset conditions, including periods when discharge may need to be paused based on monitoring results. The function of this tank is to support treatment system operations rather than the routine storage of contact water. The updated project graphics would depict this tank, along with other surface tanks associated with the facility, including fire water storage and sewage waste tanks. These tanks would be designed with appropriate secondary containment when needed.
1637	6.b	622		If construction starts in 2028 and is anticipated to last for 24 months, then shouldn't the production year start in 2030?	Confirm if production is intended to begin in 2030. RGU will update in Scoping EAW.	Thank you for the comment. While the overall construction period is anticipated to be approximately 24 months, Table 6.2 reflects that certain facilities and systems would become operational prior to completion of all construction activities. These early completions would allow for initial underground development and low-rate production to begin before the end of the full construction period. As a result, the start of production would not necessarily align with the completion of all construction activities.
1638	6.b	652		RGU notes that volume of shallow and deeper peat to be excavated for railway construction will be analyzed in the EIS.	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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1639	Section 6.5	678		If one excavates a ramp/drift you change the material properties of the formations (which may lower or raise the water table). A baseline characterization should show the groundwater table before any mining activity. Some kind of predicted water table during and post mining has to be shown. The dewatering rates (active or passive) during the excavation of the ramp would be helpful and necessary.	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1640	6.b	735		Does rock quality data demonstrate competent bedrock for a bentonite cutoff wall?	Answer question.	Thank you for the comment. Rock quality and bedrock conditions have been investigated through geotechnical and hydrogeological studies to inform the design of the cutoff wall. Available data indicate that the bedrock at the base of the cutoff cell would be sufficiently competent to allow the bentonite cutoff wall to key into bedrock and function as intended.
1641	6.5.2	739		Dewatering 1.4-3.6 million gallons over a 14 day period, in addition to the construction and ongoing impacts of the project (Est 50 million gallons per year?), should be evaluated for groundwater quantity, quality, flow impacts and water quantity concerns for water supply wells, public and private wells. In addition, impacts to bogs, streams and lakes that are fed by groundwater should also be assessed for impacts.	Advisory Only. Need for information on these impacts will be included in the DSDD.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1642	6.5.2	746		Will additional analysis of this discharge include release/flow rates?	Answer question.	Thank you for your comment. We have revised the EAW to state the following: **EDIT** **Original:** "The EIS data submittal, however, would provide additional analysis regarding the level of treatment required for discharge." **New:** "The EIS data submittal, however, would provide additional analysis regarding the flow and level of

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						treatment required for discharge. [R4_Cmt_#1642]"
1643	6.b	763		RGU notes that Scoping EAW and Draft Scoping Decision document will identify the need for data regarding the overburden to be excavated, including how much is peat or bog soil would be excavated. Any material removed from the site would be required to meet applicable regulations, which would depend in part on how these and other different materials are classified under the Permit to Mine (to be determined).	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1644	6.55	809		RGU notes the DSDD will likely require identification of potential sensitive for each of the potential impact areas listed in the text.	Advisory.	Thank you for the comment. Clarification would be helpful regarding the reference to “potential sensitive”.
1645	6.b	816		RGU notes the cited rule should be Chapter 6132 and not Chapter 6125. No change in text requested. RGU will address during development of v1SEAW document.	Advisory.	Thank you for your advisory comment.
1646	6.b	818		RGU notes the cited rule should be Chapter 6132 and not Chapter 6125. No change in text requested. RGU will address during development of v1SEAW document.	Advisory.	Thank you for your advisory comment.
1647	6.b	952		Per 30 CFR 57.11050(a), will the decline ramp serve as one of the "two or more separate, properly maintained escapeways to the surface from the lowest levels"?	Answer question.	Thank you for the comment. The EAW identifies the portal as the primary mine access and egress and Surface Raise #1 as a secondary mine egress. Together, these features are intended to provide multiple means of escape to the surface consistent with applicable mine safety requirements.
1648	6.b	1012	Graphic 6.8	RGU notes that the EIS may require a figure or graphic showing scale, depth, and approximate orientation of drill-and-blast and drill-and-fill operations, including the scale of the crown pillar.	Advisory.	Thank you for your advisory comment.

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1649	6.b	1029		RGU notes that the EIS may require data on the efficacy of the reverse osmosis system in the water treatment plant for chemicals used during construction and mining such as emulsions and explosives ANFO.	Advisory.	Thank you for your advisory comment.
1650	6.b	1041		Is talon considering control equipment other than a wet scrubber?	Answer question.	Thank you for the comment. The Project identifies a wet scrubber as the exhaust control technology for mine ventilation. At this time, Talon is not considering alternative exhaust control equipment. The selected approach reflects the expected exhaust characteristics.
1651	6.b	1144		What is proximity of the proposed drop raise and raise bore locations to sensitive receptors for noise?	Answer question.	Thank you for the comment. Based on the current site layout, the nearest identified noise-sensitive receptors are approximately 2,000 to 2,500 feet from the proposed drop raise and raise bore locations.
1652	6.b	1201		Please note that a water appropriation permit would be required for water sourced from the stormwater management system if it exceeds 10,000 gallons per day or 1 million gallons per year.	Advisory.	Thank you for noting the permitting thresholds. Minnesota Statutes section 103G.271, subdivision 1, identifies circumstances in which a water appropriation permit is required, as well as specific exemptions. Subdivision 1(b)(3) provides that a permit is not required for the appropriation or use of stormwater collected and used to reduce stormwater runoff volume, treat stormwater, or sustain groundwater supplies when water is extracted from constructed stormwater management facilities. Whether a water appropriation permit applies to a particular stormwater use depends on how the stormwater is being managed within the system. Talon will continue to coordinate with the DNR as the Project design is further developed to ensure compliance with applicable requirements.
1653	6.b	1211		Crown pillar deflection over what time period?	Answer question.	Thank you for the inquiry. Crown pillar deflection is evaluated using industry-standard empirical and numerical stability methods that are intended to assess long-term and post-closure performance rather than deformation over a defined calendar period. The

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						analyses do not model deflection as a function of time (e.g., years or decades). Instead, conservative input assumptions are applied to represent long-term and post-closure conditions and the resulting deformation represents an equilibrium response under those conditions. Accordingly, the reported crown pillar deflection reflects the magnitude of deformation expected under long-term closure conditions, not progressive deflection occurring over a specified time interval.
1654	6.b	1259	Graphic 6.14	Graphic depicts two fresh air intake blowers, and one fresh air circulation booster blower, but only one exhaust air blower. Will just one exhaust air blower be sufficient to remove the CO_2 and explosive gasses products that are deeper than 1000ft?	Answer question.	Thank you for your question. Modelling being undertaken by the Project will demonstrate that the ventilation system would meet overall ventilation requirements, ensuring compliance with Mine Safety and Health Administration (MSHA) standards.
1655	6.b	1318		RGU notes that a table that contains details on the expected ore and waste rock yield during the life of the project may be required in the EIS.	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1656	6.b	1325		Please explain what is meant by the ore buffer area and the CRF waste rock buffer area in the Transfer Ore building. Are they indoor stockpiles?	Answer question.	Thank you for your comment. The ore buffer area and waste rock buffer area are designated places within the Ore Transfer Building where each material would be piled prior to sizing.
1657	6.b	1375		For what period of time would the excavated peat be stored temporarily on site before being transported offsite to an appropriately licensed landfill?	Answer question.	Thank you for the comment. The duration of temporary on-site storage of excavated peat has not yet been defined, as it would depend on construction sequencing, staging, and haul scheduling that would be developed during detailed design. The intent would be to minimize on-site storage to the extent practicable and transport excavated peat off site to an appropriately licensed facility as construction activities progress. Specific handling durations and logistics would be addressed as part of construction planning.
1658	6.b	1395		Why is the aggregate buffer located outside of the building rather than inside the building like the ore and waste rock?	Answer question.	Thank you for your question. The externally sourced aggregate buffer would be located outside the Ore

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						Transfer Building because commercially sourced aggregate would arrive from local quarries and would be managed using standard industry practices for clean fill materials.
1659	6.b	1397		Is any grout, bentonite, or liner proposed for use with CRF or waste rock backfill? Under what conditions?	Answer question.	Thank you for your question. No grout, bentonite, or liners would be used in CRF or waste-rock backfill.
1660	6.b	1413		Is the rail loading buffer area the same as the ore and CRF waste rock buffer area or is it its own area? If it is unique, please describe generally what it is.	Provide clarity.	Thank you for your question. The ore buffer area and waste rock buffer area are designated places within the Ore Transfer Building where each material would be piled prior to sizing. The rail loading buffer area is where the sized material would be piled prior to loading into the rail gondolas.
1661	6.b	1415		Will Talon use BNSF railcars or purchase them for the project?	Answer question.	Thank you for your question. The Project would determine the commercial terms for the railcars based on financial modelling, market conditions, availability, and other factors as the project progresses.
1662	6.b	1491		Would blasting activities take place while water is present in the sumps?	Answer question.	Thank you for the question. Water may be present in underground sumps as part of normal mine water management. Talon is unsure how this condition relates to the environmental effects evaluated in the EAW and would appreciate clarification from the RGU regarding the context or environmental pathway of concern so that the comment can be properly understood and addressed.
1663	6.b	1584		Will stormwater be managed to prevent increased mercury methylation and ensure non-degradation of receiving wetlands and/or water quality?	Answer question.	Thank you for the inquiry. Stormwater generated at the Project would be managed under the applicable NPDES/SDS permitting programs administered by the Minnesota Pollution Control Agency. These permits establish the best management practices and control measures necessary to protect downgradient wetlands and surface waters and are the regulatory mechanism used by the State to ensure that stormwater management meets water-quality objectives. The detailed evaluation of stormwater controls and associated

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						permit conditions would occur through the NPDES/SDS permitting process.
1664	6.b	1694		RGU notes that a more detailed graphic of the proposed support facilities could be required in the EIS.	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1665	6.b	1762		It would be good to ensure spill response protocols include checking if a spill or train derailment occurs within a Drinking Water Supply Management Area, and if so, what process modifications should be made.	Advisory.	Thank you for your advisory comment.
1666	6.b	1812		Commenter recommends including secondary containment around all fuel tanks and other hazardous substances to minimize spills.	Advisory.	Thank you for your advisory comment.
1667	6.21.6	1819		As part of dust control, will train cars leaving the ore transfer building receive any pressure wash treatment? If not, could you briefly explain why?	Answer question.	Thank you for the comment. The Project relies on an enclosed loading process that is intended to prevent accumulation of material on the exterior of railcars. As a result, pressure washing with water is not proposed. The Project is evaluating an air wash of loaded railcars prior to their exit from the Ore Transfer Building. Washing railcars with water would be problematic given winter freezing conditions, as well as associated safety and operational concerns.
1668	6.b	1854		In addition to capture efficiency, EIS should describe chemical composition of particulates and standards and limits that to prevent adverse health effects that will be met for workers and public in and outside Ore Transfer Building.	Advisory.	Thank you for your advisory comment.
1669	6.b	1877		Does "the controlled and phased management of fresh and exhaust air to ensure safe construction and operational conditions for underground workings" mean compliance with MSHA standards or are there other requirements to meet for this?	Answer question.	Thank you for the inquiry. Yes, the phased management of fresh air and exhaust air must be in compliance with MSHA and industry best practices during each of the project development and operational phases. (i.e., sufficient ventilation and escapeway routing, refuge and controls have been designed

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						around the mine plan to account for this).
1670	6.b	1938		What would constitute a beneficial use for mine site?	Answer question.	Thank you for the comment. While the Project does not have a specific post-closure reuse identified at this time, mining infrastructure is frequently repurposed for beneficial uses such as industrial, logistics, or community functions following closure. The Project will work with the RGU and community during the closure planning process to evaluate feasible beneficial uses based on conditions at that time.
1671	6.b	1940		What is the interaction between the deeper bedrock water and the shallower bedrock water?	Answer question.	Thank you for the inquiry. In general, the degree of confinement and isolation from surface processes in the groundwater system increases with increasing depth by virtue of the increasing thickness of the intervening strata. At watershed scale, conceptually, nested local to regional flow groundwater patterns emerge from the topography. The local and intermediate flow paths occur in the relatively shallow subsurface with relatively short travel paths between recharge and discharge areas with more active flow resulting in lower total dissolved solids in the water and predominantly calcium bicarbonate and sodium bicarbonate water quality types. At deeper depths, the presence of higher total dissolved solids in the water with a distinct trend of increasing total dissolved solids with depth combined with sodium chloride water type is indicative of a more regional flow system with longer flow paths, longer residence times and more sluggish groundwater flow. The demarcation between the more active groundwater circulation with good connectivity to surface water bodies

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						and the deeper, more isolated, sluggish groundwater flow system will be based on a systematic and comprehensive assessment as part of the EIS. However, a preliminary and ongoing review of a part of the data set suggests that the demarcation occurs at depths of several hundreds of feet below surface.
1672	6.b	1954		Minn. R. 6132 requires prompt sealing of access to underground mines and include avoidance of subsidence in reclamation standards.	Provide details on how these requirements would be met.	Thank you for the comment. The Project would comply with Minn. R. 6132, including requirements related to sealing underground access and subsidence, and these matters would be addressed as part of the Permit to Mine application process.
1673	6.b	1982		Please provide a map the Tamarack Resource area as it is located within the Tamarack Intrusive complex as a whole.	Provide Figure as requested.	**EDIT** A graphic has been added.
1674	7.a	2040	Graphic 7.3	Does data exist for 100-year storm events from after 2020 that could be included in this graphic?	Provide updated storm event data, if available.	Thank you for the inquiry. While precipitation data collected after 2020 are available, the analysis shown in Graphic 7.3 used 38 long-term monitoring stations across Minnesota to evaluate trends through 2020—the most recent period for which consistent, quality-assured data were available across all sites at the time of analysis. Re-evaluation of these sites could be conducted to extend the record; however, the existing analysis demonstrates the primary conclusion—that the frequency of intense storm events in Minnesota has increased over time. This trend supports the purpose of the figure in the EAW. A similar evaluation incorporating post-2020 data may be considered as part of the EIS data submittal. No changes to the EAW are proposed at this time.
1675	7.a	2110		RGU notes that the lifespan of the project includes mine closure and reclamation, thus analysis on climate effects will include that additional timeframe. Standard reclamation practices include 3 years for closure and 10 years for monitoring.	Advisory.	Thank you for your advisory comment.

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1676	7.2b	2139	Table 7.1	Excavated peat and muck should be included as a climate consideration because of the potential for CO2 release during degradation.	Advisory. To be included in the Scoping EAW.	Thank you for your advisory comment.
1677	7.b	2139	Table 7.1	RGU will add a row back in to the table for "fish, wildlife, plant communities, sensitive ecological resources", recognizing that the next three columns will say "addressed in section 14"	Advisory.	Thank you for your advisory comment.
1678	7.2	2139	Table 7.1	"A portion of the upland area may return to agricultural production." Please clarify the timeframe when this might occur, e.g. during or after the mining project? Does "agricultural production" include croplands and grazing lands? Do "uplands" include former wetlands converted due to operations, since Table 8.1 indicates that no wetlands will be restored after closure? If so, it would be inaccurate to say those former wetlands will return to agricultural production, since they have never been in ag use.	Answer questions.	Thank you for the comment. The reference to “a portion of the upland area may return to agricultural production” was intended to describe a potential post-closure land use. Not all upland areas are expected to be suitable for, or intended for, agricultural use, and the outcome would ultimately depend on landowner preference and site conditions following closure and reclamation. To improve clarity and avoid misinterpretation, the EAW language has been edited. **EDIT** **Original** “A portion of the upland area may return to agricultural production.” **Modified** “Portions of the upland area may be used for agricultural production. [R4_Cmt_#1678]"
1679	12.b.ii	2204		Is the transportation of sewage waste included in the GHG emission estimates?	Please answer question.	Thank you for the inquiry. The transportation of sanitary sewage waste is not included in the operational greenhouse gas (GHG) emission estimates because the sewage generated at the facility would be collected and transported by a licensed third-party hauler to a permitted municipal wastewater treatment facility. As such, the GHG emissions associated with this activity fall under indirect Scope 3 emissions, which are not typically required for inclusion in project-level environmental review GHG inventories under Minnesota

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						Environmental Policy Act (MEPA) guidance.
1680	11.a	2314		RGU notes that graphical representation of horizontal and vertical areas of fracture may be required in EIS.	Advisory. To be included in the DSDD.	Thank you for your advisory comment.
1681	11.b	2335		RGU notes that a discussion may be included in scoping documentation on how the project and nearby areas of very low relief and nearly level slope may impact flooding and contaminants.	Advisory.	Thank you for your advisory comment.
1682	12.0ai	2426		Source of nutrient impairment described. Was there information from the referenced TMDL about source of fish mercury impairment?	Please answer question.	Thank you for the inquiry. The EAW references the 2011 nutrient TMDL for Big Sandy Lake solely for information regarding sources of excess nutrients. The nutrient TMDL does not contain source information for the lake's separate fish-tissue mercury impairment. Mercury impairment information is derived from the MPCA's impaired waters dataset rather than from the nutrient TMDL. Accordingly, the EAW did not rely on the nutrient TMDL for mercury-related information because such information is not included in that document.
1683	12.a.i	2482		EAW needs to specifically identify potential environmental effects, including loss of ecosystem services, and increased mercury release, methylation, and bioaccumulation.	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1684	12.b.ii	2726		If the "majority of stormwater from the Project would be discharged generally northward" to HUC10 #0701010305, can we then assume the remaining balance of the discharge will be southward to HUC10 #0701010306)?	Answer question.	Thank you for the comment. Yes. It is reasonable to assume that stormwater generated outside the areas draining northward would discharge southward to HUC10 #0701010306.
1685	12.b.iii	2789		Please explain what is meant by the statement that water use, "is expected to be resilient with respect to climate trends"?	Answer question.	Thank you for the inquiry. The statement refers to the Project's potable water needs and indicates that the available groundwater supply is anticipated to remain within the range needed to support those uses under the climate conditions evaluated in the referenced studies. This conclusion is based on regional assessments indicating low risk to water supply sustainability

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						through mid-century and on qualitative review of projected precipitation and temperature trends for the area. The term “resilient” is intended to convey that the potable water demand associated with the Project is not expected to exceed the capacity of the groundwater source under the modeled climate trends.
1686	12.b.iv.a	2830		There is no discussion of how dewatering will affect wetlands in the project vicinity	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1687	12.b.iv.a	2844		EAW must state that indirect effects of wetlands from dewatering, rewetting, sulfate in discharge and sulfur in air emissions and particulates could result in increased mercury methylation and bioaccumulation.	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1688	14.b	3119		Have any preliminary surveys been considered to identify other culturally important and medicinal plants on or downstream of the project area?	Answer question.	Thank you for the inquiry. Project development has occurred with an understanding that plant communities across the Project Area may hold cultural, medicinal, or other importance. A cultural resources survey of the area proposed for development was completed in 2022. Rather than attempting to pre-classify individual plant species or assign relative importance at this stage, project planning has emphasized reducing the extent of surface disturbance through refinement of the project layout and limits of disturbance. This approach is intended to minimize potential interactions with vegetation generally, recognizing that cultural relationships with plant resources.
1689	14.c	3184		Scoping EAW may discuss impacts of railway introduction of invasive species.	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1690	17.a	3359		RGU acknowledges that a list of all pollutants, including all pertinent HAPs, will be provided for the EIS.	Advisory.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.

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1691	17.c	3458		RGU acknowledges that fugitive particulate chemical composition will be evaluated in the EIS, and that depending on toxicity and volume of particulates, additional alternatives or mitigations could be evaluated.	Advisory. To be included in the DSDD.	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1692	19	3584		If known, please provide an estimate of the maximum noise and frequency, regardless of compliance with L10 and L50 limits.	Provide requested information.	Thank you for the question. Noise levels and associated frequency characteristics will be determined and provided in the EIS data submittal.
1693	21.a	3691		Regional scale impacts should also include changes to downstream waters, including the Mississippi River, particularly with respect to methylmercury bioaccumulation and release of nutrients.	Advisory. RGU will address in scoping EAW	Thank you for your advisory comment. We appreciate your input and will consider it as we review the project details.
1694	21.b	3730		RGU notes that exploratory drilling impacts may be included during the cumulative impacts analysis.	Advisory.	Thank you for your advisory comment.
1695	6.1.6			Does contingency planning to date include a water diversion in case of a spill as part of the controls and BMPs that will be used to address construction stormwater, construction water, and Construction water from portal and SEM Section of the Decline ramp?	Answer question.	Thank you for the inquiry. The Environmental Assessment Worksheet describes construction stormwater and construction water management at a conceptual level, with detailed controls and spill-response procedures addressed through the Construction Stormwater General Permit and the Stormwater Pollution Prevention Plan prepared during permitting. If the development of a contingency for spill-related water diversion is viewed as a best management practice, Talon would request examples of projects or Stormwater Pollution Prevention Plans where such measures have been implemented, to understand how this type of approach has been applied and to evaluate it appropriately during future regulatory permitting activities.
1696	Figures		Figure 6	Has any potential impact to groundwater quality, quantity, flow, or water supply wells (Private or Public) been assessed?	Answer question.	Thank you for the question. The EAW describes the ongoing groundwater monitoring program and the development of the conceptual model that supports preliminary evaluations of groundwater levels, groundwater quality, and groundwater flow conditions in and around the Project Area. These evaluations provide the

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						foundation for assessing potential influences on groundwater quality, quantity, flow patterns, and nearby water supply wells. The full impact assessment, including quantitative modeling of potential Project-related effects, would be completed as part of the EIS data submittal, where the groundwater flow model and associated analyses would be presented.
1697	Figures		Figure 18	Please add HUC10 boundaries on the graphic	Revise figure.	The requested HUC10 watershed boundaries were not included on the referenced figure in the current submittal. The figures will be updated to include the HUC10 boundaries and provided to the RGU under separate cover. The update is forthcoming.
1698	Figures		Figure 5	Please add HUC10 boundaries on the graphic	Revise figure.	The requested HUC10 watershed boundaries were not included on the referenced figure in the current submittal. The figures will be updated to include the HUC10 boundaries and provided to the RGU under separate cover. The update is forthcoming.
1699	Figures		Figure 7	Please add HUC10 boundaries on the graphic	Revise figure.	The requested HUC10 watershed boundaries were not included on the referenced figure in the current submittal. The figures will be updated to include the HUC10 boundaries and provided to the RGU under separate cover. The update is forthcoming.
1700	Figures		Figure 21	Colors for high and moderate biodiversity hard to distinguish. Use colors with more contrast and/or less transparency.	Please resubmit this figure.	The contrast and transparency have been adjusted.
1701	Figures		Figure 8	If known, at what depth to water is the location the mine decline ramp is proposed to be constructed at?	Answer question.	Thank you for the inquiry. The depth to groundwater along the proposed decline ramp varies because the alignment extends from higher-elevation areas near the Ore Transfer Building toward lower-elevation areas located to the east. In the upland portion of the alignment, groundwater is expected to occur at 41-80 inches, while shallower groundwater conditions 0-6 inches are expected as the alignment extends to the east. This variation reflects the natural

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						topographic gradient and associated groundwater table.
1702	Figures		Figure 22	Is mine decline ramp proposed to be constructed in open bog?	Answer question.	Thank you for the comment. A portion of the mine decline ramp would be constructed through an area classified as open bog.
1703	18			Per EQB guidance, the Scoping EAW will require preliminary quantitative estimates for GHGs.	Advisory.	Thank you for your advisory comment.
1704	Figures		Figure 8	A North-South stratigraphic cross section that shows the zero pressure line (water table) would be useful in understanding the hydrology	Consider comment and add to figure if possible.	Thank you for the comment. The EAW figures are intended to provide a screening-level depiction of site conditions and do not include detailed groundwater surfaces such as a zero-pressure line. Development of stratigraphic cross sections showing groundwater levels and hydrogeologic conditions would require additional data and analysis that are more appropriately addressed as part of the EIS. Accordingly, the figure is not being modified at this stage.
1705	Figures		Figure 11	In addition to surficial geology, it would be useful to have stratigraphic cross sections (E-W) at various points of interest	Consider comment and add to figure if possible.	Thank you for the comment. At the EAW stage, figures are provided to support a high-level understanding of site conditions and are not intended to present detailed subsurface stratigraphy. Preparation of east–west stratigraphic cross sections at specific points of interest would involve additional data development and interpretive analysis that would be undertaken, as appropriate, during the EIS. For this reason, the figures are not being revised at this time.
1706	Figures		Figure 13	Please provide contour lines on this map.	Please resubmit this figure.	Contour lines have been added to the figure.

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