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I have gathered wild rice very near the proposed mine site, and have often visited the lakes and the Mississippi River downstream. I have experience with evaluating copper/nickel mining risks and regulations dating back to my participation as the lead of the environmental team participating in the Mining Simulation Project, a collaboration of DNR, the non-ferrous mining industry and environmental groups from the late 1980s.

I am very concerned that the Minnesota Department of Natural Resources is not taking its regulatory responsibilities seriously. I cannot understand how EIS scoping can proceed when no formal mine plan, nor feasibility or pre-feasibility plan is available for the public to review? We've heard a series of press releases which suggest a very small underground mine (focusing on less than 1% of the mineralization) with all reactive waste shipped off to North Dakota? Or is it Upper Michigan? Pay no attention to the most polluting byproduct of this mine! There are "no reserves" – implying this is all there is, there's no more mining planned in the area.

Yet, more than 500 bore holes in one small area of the deposit are accompanied by press releases to the investor community talking about the thick layers of massive sulfide and rich disseminated ore. They tout a "mining district scale deposit." (Talon, Moving Forward, January 2025)

Bait and switch. It is completely unacceptable to scope an EIS on a tiny footprint, when the industry, the DNR and investors all know there is a lot more ore in the deposit, which will eventually be mined. It is clear that while a small underground mine may go for the richest deposits first to pay off mining infrastructure, the ultimate destination is the creation of a massive open pit mine to extract all ore in the district.

It is highly unlikely, based on DNR's track record of regulating the taconite industry, that any further environmental review will be required as the tiny, initial underground mine expands to gradually mine the entire ore body over years. The dubious economics of shipping ore to other states for processing will fall apart as lower-grade ores are mined in future years, and reactive waste will be dumped on site.

Therefore, due to the lack of any mine plan, and public relations releases to investors describing a future mining district, my specific comments as to scoping of this premature EIS are as follows:

- Scope the EIS to evaluate all risks from fully developing this ore body, including the storage of reactive mine waste from future mining of lower grade ores, including by open pit mining. (Some of the disseminated ore lies under just 100 feet of glacial till.)

- Consider the impacts to surface water and groundwater from exposure to massive sulfides as millions of gallons per day are pumped from ever-expanding shafts and pits.
- How will this water be treated? Where will it be discharged? What effect will this have on nearby lakes and streams and wetlands? What about wild rice? Wildlife?
- With no pre-feasibility or feasibility study examining the economics of shipping ore to other state(s) for processing, what if those options don't pencil out? What if the only economical option is to process and store wastes on-site? In the absence of any economic analysis, this possibility must be scoped. This leads to a host of potential air quality (from processing of ore) and water quality impacts from potential acid mine drainage that must be examined..
- Given the nebulous nature of this proposal, and the great potential for this deposit to lead to a several miles long open pit mine that straddles a watershed divide in the future, it is appropriate to scope a comprehensive study of all natural resources in the region and downstream (Mississippi and Saint Croix Rivers) on the scale of what was done in the 1970's in the Arrowhead region's "Copper Nickel Study." (i.e. all native flora and fauna, lands, air and waters of all sorts, cultural sites and more must be documented and evaluated for risks from the development of a mining district in this region that has never seen such impacts.)